



STATE OF UTAH
NATURAL RESOURCES & ENERGY
Oil, Gas & Mining

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0015

April 26, 1982

REGISTERED RETURN RECEIPT REQUESTED

Mr. Trevor G. Whiteside
Senior Mining Engineer
Valley Camp of Utah, Incorporated
Scotfield Route
Helper, Utah 84526

RE: Belina 1 and 2
Topsoil Exchange
Stipulation 8-19-1 through 8-19-3
ACT/007/001

Dear Mr. Whiteside:

As you are aware, a request from Valley Camp and Coastal States for topsoil exchange was approved with stipulations via an August 21, 1981, letter from the Division. In short, these stipulations addressed soil chemical suitability, temporary storage, and permanent redistribution and protection.

You will recall our April 20, 1982, telephone conversation. At that time it was established (as this letter documents) that Stipulation #81-19-1 had been adequately complied with in a timely basis (see September 21, 1981, letter with attachment). Also, 81-19-2 would go into effect only in the event of a specified condition, which may not necessarily occur. I would like to discuss, at this time, Stipulation 81-19-3.

Measures mentioned by Valley Camp in the aforementioned letter are adequate with regard to topsoil depth, and seeding. However, some concerns discussed in our April 20, 1982, telephone conversation are outlined below.

- 1) A concern regarding topsoil contamination due to proximity to the conveyor belt and the influence of coal falling from the belt.

Recommended Action: As soon as weather permits, Valley Camp should act to determine an adequate buffer strip based on the probable area of influence (contamination of soil) from the conveyor and provide the Division with the extent of this buffer strip prior to any topsoil redistribution activities.

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2) ~~The~~ 2:1 slope extending from north to south below the conveyor is at final grade and may (if properly revegetated) be considered for final reclamation. In light of this, it is important to consider the possibility that contamination of soil resulting from mining activity in this area would, due to an adverse affect on revegetation, have a negative impact on bond retrieval.

Also submitted for your consideration are other possible undesirable circumstances.

It is possible that surface activities (including snow removal) could provide a path through which coal fines or pad materials (possibly containing a mix of lubricants, diesel oil and coal fines) could result in topsoil contamination and poor revegetation.

Recommended Action:

a) Maintain all berms and culverts which guard this area against external influence.

b) Propose a method to decrease the transport of the above materials via snow removal activities to the topsoil on the downslopes.

Another concern of the Division is the wording of the Valley Camp response to 81-19-3. In paragraph three (3) of the September 21, 1981, letter it is stated that "upon completion of topsoil redistribution the prepared area will be seeded and covered with straw or some other type of mulch."

The concern here is as follows: In the event that reseeding does not occur immediately (Fall seeding is expedient) then no statement to address protection until seeding and mulching is provided by Valley Camp. In Stipulation 81-19-3 it calls for protection prior to seeding.

Valley Camp must commit to mulching or other protection prior to reseeding in order to comply with this stipulation.

Possibly the most serious concern is the placement of topsoil on the inslope of the sediment pond. Protection of the topsoil in this location would be most difficult. In the event of its erosion into the pond, its value for reclamation may be severely impaired due to mixing with possibly contaminated sediment captured in the pond. It is probable that this sediment would contain coal fines, lubricants and diesel contaminants.

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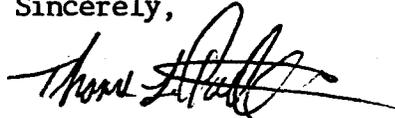
Due to the above concerns, the Division would also like to submit for your consideration the following alternative. It may be more beneficial to store the 6,000 cubic yards obtained in this transfer at the existing Belina topsoil storage site. It would be adequate to store this volume of soil and protection would be easier to effect prior to its future redistribution at the cessation of mining. If this alternative is chosen, it may be to the advantage of Valley Camp to attempt to establish an interim plant species (possibly orchard grass) to get better stabilization of these non-topsoiled on the 2:1 slope areas and to prevent erosion problems.

If this alternative is chosen, please provide the Division with:

- 1) The selected species for slope stabilization.
- 2) The method(s) of protection to be employed for topsoil storage at the Belina topsoil storage location including the species chosen for interim revegetation of the topsoil.

If you have any questions, please feel free to call.

Sincerely,



THOMAS L. PORTLE
RECLAMATION SOILS SPECIALIST

cc: Ron Daniels, OGM
Dave [redacted], OGM
Joe [redacted], OGM

TLP/tr