



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

Scott M. Matheson, Governor
Temple A. Reynolds, Executive Director
Cleon B. Feight, Division Director

4241 State Office Building • Salt Lake City, UT 84114 • 801-533-5771

0019

July 28, 1982

Mr. Trevor Whiteside
Valley Camp of Utah, Inc.
Scofield Route
Helper, Utah 84526

RE: Belina Complex
Mine Plan Review
ACT/007/001
Carbon County, Utah

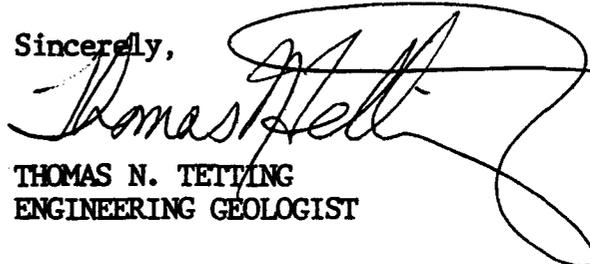
Dear Mr. Whiteside:

During the continuing review of Valley Camp's Permit Application the Division has found that it will be most expedient to inform you of the current results as they develop regardless of the status of their composition. Therefore, to enable you and your staff to prepare information for a response to the State's Determination of Completeness for the Apparent Completeness Review the enclosed "Draft" comments are available. These comments are not intended in any way to be complete nor should you address or respond to them in a formal fashion as yet. However, you should be able to either locate the information requested or put together some thoughts on the items.

A formal completeness document should be forthcoming about the week of August 16, 1982. It will incorporate the enclosed comments and potentially, other requests. Additionally, I would like to affirm the date of August 24, 1982, a Tuesday, as a time when we could discuss with you any questions that have developed during the review. At that time it will also be convenient to have on hand the review staff from the Office of Surface Mining and the consultants, hired for assistance. One o'clock would be the suggested time for the occasion. Please confirm with me that this date will be opportune.

I hope you may be able to make use of the "head-start" and look forward to the meeting in August.

Sincerely,



THOMAS N. TETTING
ENGINEERING GEOLOGIST

Enclosure

TNT/mn

cc: OSM, Sarah Branson
Pam Grubaugh-Littig

Board/Charles R. Henderson, Chairman • John L. Bell • E. Steele McIntyre • Edward T. Beck
Robert R. Norman • Margaret R. Bird • Herm Olsen

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APPARENT COMPLETENESS REVIEW
BELINA COMPLEX
VALLEY CAMP OF UTAH, INC.

- (1) The applicant's response to UMC 782.14 must include the identity of the division issuing a violation notice and the applicant's action taken to abate the violation.
- (2) The applicant must submit the report prepared by Gates Engineering Company that was to be completed on July 1. This report will be used to evaluate the apparent completeness with respect to UMC 783.14.
- (3) In order for the response to UMC 783.19 to be complete, Map G should specifically delineate areas to be disturbed by this operation. The present map only shows the vegetation types in the area, not the specific areas and vegetation types that will actually be disturbed. The acreages of vegetation communities to be disturbed must also be calculated and provided in numerical form.
- (4) The response to UMC 817.97 is deficient in several respects. The applicant has not provided a map delineating key wildlife areas as required by DOGM in paragraph 1 of the ACR for this section. We do not concur with Valley Camp that the section on UMC 784.21 commits to the mitigating measures proposed by DWR. A specific statement of commitment should be made. No support for the statement regarding goshawks and Cooper's hawks ability to withstand considerable human impact was provided. This must be provided as requested by DOGM.
- (5) The applicant should provide the maps of the portal and load-out areas which he states would be prepared as soon as snow cover melts. Calculations of yardages and acreages involved should be provided, as well as delineating the areas on the maps. This information is required to judge the apparent completeness in regard to UMC 784.12 (Reclamation Plan: General Requirements). Assumptions that are included in the calculations and sources of unit costs should be specifically stated.

The applicant refers to Section 783.14 in answer to questions in DOGM's paragraph 3 regarding conservation of the coal resource. This information should be provided either in the forthcoming Gates Engineering report or as a separate response. The present information is inadequate. The applicant has also not committed to notifying the USGS prior to abandoning underground operations or portals. This must be specifically stated.

- (6) In response to inadequacies noted by DOGM in regard to UMC 784.13 (Revegetation), the applicant stated that as soon as snow cover melts the disturbed areas would be mapped and a response and plan would be prepared. This response to DOGM's ACR should be submitted for review of apparent completeness.

APPARENT COMPLETENESS REVIEW
BELINA COMPLEX
VALLEY CAMP OF UTAH, INC.
(Continued)

- (7) The applicant must supply the reasoning and support for land use changes as requested by DOGM in paragraph 3 of its ACR of UMC 784.15. The applicant also must provide details of his maintenance plan for the drainage system.
- (8) In response to DOGM's questions in paragraph 1 on UMC 784.16, Union Camp seems to indicate that the emergency spillway of the #4 dam will serve as the lower end of an overflow diversion ditch in the post-mining period. This ditch appears to be a permanent structure. Please state whether this is the case. If so, also provide design data for this ditch for the post-mining period and provide details of its proposed operation, including a drawing of the inlet configuration, in relation to the culvert.
- (9) The engineering drawing provided in the Golder Associates report (Appendix A) are not certified by a professional engineer as requested by DOGM in its ACR of UMC 784.19.
- (10) In regards to the ACR of UMC 784.20, the applicant should provide letters from the surface managing agency and the surface owners to verify that subsidence would not cause material damage or diminution of value or reasonably foreseeable use of lands. This was previously requested by DOGM. The applicant must also provide a description of the measures to be taken to mitigate material damage or diminution of value or reasonable foreseeable use of lands, if it should occur, due to subsidence pursuant to UMC 784.20(C) and UMC 817.124.
- (11) The applicant's response to DOGM's ACR comments on Section UMC 784.21 are incomplete. As noted in item (4) above, the applicant has not provided a definitive statement of commitment to the DWR wildlife protection plan. The applicant must either make this commitment or provide its own thorough plan of appropriate mitigation measures. Such a plan is not presently included in the MRP. The applicant must also provide support for the statement regarding goshawks' and Cooper's hawks' ability to withstand human impact.
- (12) The applicant states in response to DOGM's ACR on UMC 784.22 that the 42" culvert on the Whiskey Canyon drainage will not be removed and will be a permanent structure. The applicant should provide information on the proposed maintenance of this culvert in the post-mining period, means of preventing it from becoming a public safety hazard (i.e. a 42" CMP is large enough to be entered by children) and the inlet configuration and its relationship to the overflow diversion channel. Longitudinal (not cross-sectional as currently provided) profiles of the culvert and diversion channel should also be provided. These profiles should show any drop structures or other velocity control structures.