



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

0024

August 18, 1982

Ms. Sarah Branson
Western Technical Center
Office of Surface Mining
Brooks Towers
1020 Fifteenth Street
Denver, Colorado 80202

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

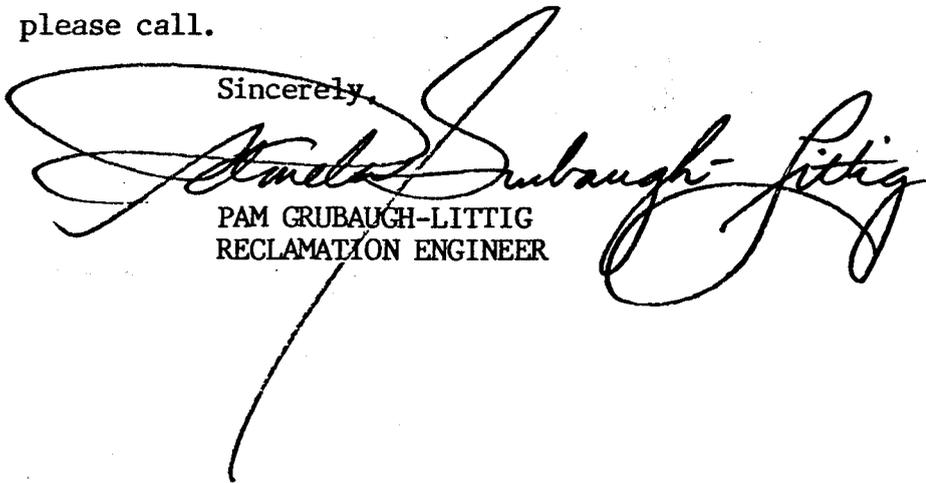
Dear Sarah:

I enclosed our spot check of the review by the consultants, Envirosphere, of Valley Camp. The operations plan is a reply. The soils section was addressed using the "Determination of Completeness" format.

I'm looking forward to the Valley Camp meeting with you on Tuesday, August 24, 1982.

If there are any questions, please call.

Sincerely,


PAM GRUBAUGH-LITTIG
RECLAMATION ENGINEER

PG-L:btb

Enclosure

cc: Tom Tetting

SPOT CHECK OF ENVIROSPHERE REVIEW BY
THE DIVISION OF OIL, GAS AND MINING

Valley Camp of Utah, Inc.
Belina Complex
ACT/007/001, Carbon County, Utah

UMC 784.11 Operation Plan: General Requirements

Comments are in agreement with the consultant's. However--elaboration of second paragraph, second and third lines. Replace with "The applicant should develop plans for all drainage modifications as well as the conveyor referenced by this section. These plans should be provided to the Division 90 days prior to construction schedules in order for adequate review. A commitment should be so given and necessary regulatory approval acknowledged prior to initiation of this construction." This section will be "apparently complete" when this commitment has been made.

UMC 784.12 Operation Plan: Existing Structures

The applicant provided adequate information to this section. This section is apparently complete.

UMC 784.13 Soils (Reclamation Plan: General Requirements)

Pursuant to UMC 817.21, the applicant must provide data on sodium absorption ratio and percent moisture saturation for the soil map units "r," "t" and "u" (Vol. II, Appendix D). Is there any reason for omitting these data?

DETERMINATION OF COMPLETENESS

The additional data requested for map units "r," "t" and "u" have been submitted and the applicant is in compliance with this section.

The applicant must evaluate those materials which have been removed and stockpiled for growth medium attributes. The applicant must delineate the disturbed areas within the permit area where soils were removed or were not removed. Provide the volumes of materials which have been segregated or stockpiled (Vol. III, page 24) and discuss those areas from which soil will be removed.

DETERMINATION OF COMPLETENESS

The applicant has discussed the areas that have had soil removed and stockpiled, but presents two sets of conflicting data. In the original mine plan, the applicant indicated that soil had been removed and stockpiled. In the resubmission, the applicant states no topsoil has been saved. The applicant must clarify the discrepancy and if topsoil has been stockpiled, give the volume of topsoil available for reclamation.

The soil survey description and discussion in Vol. III, page 3a indicates soil removal would occur in all areas where disturbance would occur, however, with respect to the conveyor belt corridor, soil removal should be implemented only in cases where disturbance would impact on soil characteristics such as structure, fertility, potential productivity, contamination, etc. Therefore, the applicant should provide a description of the construction of the conveyor with an assessment of disturbance incurred on soils and vegetation.

DETERMINATION OF COMPLETENESS

The applicant has not adequately addressed the soil handling for the conveyor pursuant to UMC 783.19.

Pursuant to UMC 817.23, Topsoil Storage, the applicant should describe soil stockpile protection measures such as (1) diversion of overland flow away from the stockpile, (2) methods and configurations used for final grading, such as terracing to prevent erosion, and (3) species used for temporary revegetation.

DETERMINATION OF COMPLETENESS

The applicant has not addressed the issue of topsoil protection. The response will be dependant on whether the applicant has stockpiled soil or not.

Pursuant to UMC 817.24, Topsoil Redistribution, the applicant must provide a plan for redistribution of topsoil consistent with the volumes and types of soils stockpiled. The plan should include site preparation and redistribution depths.

DETERMINATION OF COMPLETENESS

The applicant has stated that topsoil will be redistributed by front-end loader, dozer and hand shovel where applicable.

The applicant needs to provide the source of available topsoil and the depth of topsoil to be applied upon final reclamation

If no topsoil is available and an alternative source is proposed, then the applicant must submit all information required under UMC 817.22(e), Topsoil Substitute and Supplements.

In the discussion of soils, three soils with unstable (soil creep) characteristics are described (page 87). The applicant should describe any landslide features in the mine plan area. Please describe the method used to determine whether there are, and how these, taken into account, will be incorporated in the designs for new facilities or remedies of unstable conditions in the future.

DETERMINATION OF COMPLETENESS

The applicant is in compliance with this section.