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A DIVISION OF EBASCO SERVICES INCORPORATED

February 25, 1983

Ms. Sarah Bransom
Office of Surface Mining
Brooks Towers, 2nd floor
1020 - 15th Street
Denver, CO 80201



Dear Sarah:

Re: ACR addendum related to Gates Engineering report
Belina Complex, Utah

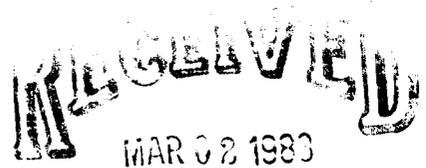
Attached is the ACR addendum related to our analyses of the Gates Engineering report for the Belina Complex. As is noted in this addendum, additional information is still needed. Most of this should be relatively easy for Valley Camp to supply since it involves primarily specific references to material cited and the providing of logs.

If you have any questions, please call.

Sincerely

Robert S. Lytle
Robert S. Lytle

RSL/slr
encl.



DIVISION OF
GAS & MINING

OSM VALLEY CAMP

Adequacy of Response to DOGM Comments: UMC 783.14

Geologic information is available in the Vaughn Hansen Report (Plate 4) which relates flowing springs to stratigraphy and geologic structure. The Vaughn Hansen Report also contains the necessary geologic information for groundwater analysis and a geologic map (Plate No. 1) of the mine area, including the location of seeps and springs. The Gates report contains photolineaments mapping (Plate 11) which supplies additional geologic information to relate structure to seeps and springs.

Drill logs used for cross section construction have not been provided, except for Wells 75-30-3 and 76-7-1. As indicated in the Gates report, cores and geophysical logs of holes drilled on or near the property are available for inspection at a core warehouse in Clear Creek and at the core library near Steamboat Springs. These logs, and the logs of observation holes indicated in the Vaughn Hansen Report (Plate 6), supply the information to support discussions and conclusions for geology and groundwater sections of the application and their inclusion will be necessary for compliance with Section 783.14 and 783.15.

The applicant has supplied updated estimates of recoverable reserves in the Gates Engineering Report (October 1982), as requested by DOGM. The Gates report also supplies coal thickness isopachs and overburden and interburden isopachs. Structural contours are provided for the top O'Conner seam, but not for the lower O'Conner A or B seams and the McKinnon seam.

The applicant has not supplied the information to justify the extrapolation of the data in the Skyline Plan concerning sulfur and alkalinity of the roof strata, as required by 783.14a(1)iii and 783.14a(1)iv. In general, references to the Skyline Plan should be more specific; e.g., refer to page or section numbers or specific figures or tables.

Since we have not reviewed previous submittals related to the USGS 211 Plan or General Mining Order No. 1, we cannot determine whether all the information contained in those submittals has also been included in the present permit application and ACR submittal. It would probably be easiest for the person from DOGM who commented on this requirement to review the presently available material to assure that all pertinent items that he was originally commenting on (but which are not defined in the original DOGM ACR) are included. We did not note any obvious deficiencies based on our review.