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Copy to Tom T. Shannon, Lynn Wayne, Ed, Tom M.

VALLEY CAMP OF UTAH, INC.

Scofield Route
Helper, Utah 84526

13 May 1983

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DIVISION OF
OIL GAS & MINING
JIM
MAY 17 1983

Mr. James W. Smith, Jr.
Coordinator of Mined Land Development
4241 State Office Building
Salt Lake City, Utah 84114

Re: Request for Approval of Realignment and Paving of Belina Complex Mine Road

Dear Mr. Smith:

In 1975, Valley Camp of Utah, Inc., constructed a road from Eccles Canyon to the Belina Mines portal area, to gain access to coal properties under their control. This road, 1.8 miles in length, was built entirely upon private properties presently under lease by Valley Camp. The surface of the road has been maintained as gravel, and as a result, has been very difficult to maintain. Problems associated with the control of dust, erosion, embankment runoff, drainage, safety and snow removal have become increasingly difficult to manage in view of regulations presently governing the use of such a road.

In an effort to eliminate such maintenance problems, improve production and safety, and minimize environmental degradation, Valley Camp is prepared to attempt minor realignment and paving of the Belina haul road during this year's construction season. Notification of this intent has been given to your office through conversations and meetings between Mr. Bob Burns of Centennial Engineering and myself with members of your staff. Preliminary drawings of the road design have been reviewed by Mr. Burns and Division employees. As a result of such meetings and subsequent site investigation by Thomas Tetting, Everett Hooper and Shannon Storrud of your office, final design of the reconstruction is complete. Three (3) sets of drawings (Nos. 15, 16 and 17) accompany this letter to you for your review.

Numerous advantages will be realized from the improvement of the existing haul road, and a few are pointed out in the following text.

General: Design of the roadway calls for a structure section of six (6) inches of asphalt, and twelve (12) inches of gravel base course, placed upon a woven geotextile reinforcing fabric. The super-elevated cross section will provide a 2.0 percent slope to the inside, or mountain side, of the road. The existing guard rail will be replaced with new, and relocated to the

outer edge of the pavement. A six (6) foot wide concrete lined ditch will be placed adjacent to the inside of the pavement and will provide periodic catch basins at cross road culvert locations.

Minor realignment of the road will occur at three (3) existing curve locations, and will be accomplished through backslope trimming and installation of bin walls on the downslopes.

Fugitive Dust: Surfacing will eliminate all dust problems presently associated with the gravel roadway. Watering requirements presently required will also be removed, which in the past, have contributed to erosion problems.

Another problem which will be resolved is the tracking of mud from the Belina Road onto the Eccles Canyon road by the coal trucks. This has created minor visibility problems in the past at this intersection.

Snow Removal: This activity, in the past, has consisted of windrowing the snow to a point where it could be picked up and blown downslope from the road. Regardless of how careful, this service yet resulted in blowing of gravel and material from the road. With the paving of the road, only clean snow will be blown off, and this will result in considerably less damage to downslope vegetation.

Sediment: The paved surface will virtually eliminate all contributions of sediment from road runoff. In addition to the concrete lined ditch along the road, each cross culvert inlet will be equipped with a silt sump equipped with highway median removable grates. These catch basins will provide drop out and storage areas for sediment from the backslopes.

These catch basins will be periodically inspected and cleaned. Sediment removed will be deposited on the portal pad areas or some other approved location within the mine permit area.

Erosion: Erosion problems in the past have been primarily associated with the road surface and drainage ditch, with very little runoff being allowed to discharge over the embankment. Paving of the road and lining of the ditch will eliminate the erosion problems and the super-elevated cross section to the inside (mountainside) of the road will further limit the amount of over the embankment discharge.

All drainage outlets will extend beyond the road fill "catch points" and discharge into erosion control facilities constructed of bedded twelve (12) inch riprap tapered from ten (10) feet to twenty (20) feet wide, and approximately forty (40) feet long. This type of section will act as an energy

dissipator and will dispense the flow, thus allowing sediment to drop and filter out of the flow. The present application of flexible downspouts will be discontinued. During construction, temporary erosion control devices, as shown on the plans and profiles, will be utilized to ensure minimization of environmental impact from runoff.

Guard Rail: The existing guard rail is located on the outermost edge of the road, and thus, allows traffic on a greater surface area than is required. This contributes to additional runoff and creates unnecessary areas for dust and erosion control. In its present location and deteriorated condition, the guard rail requires relocation and replacement. By relocating the guard rail, we will confine the area of traffic to the paved section only, and thus, reduce dust and erosion problems associated with traffic on unpaved sections.

In addition, certain sections of the existing road have earth berms along the outside edge which collect considerable amounts of snow and moisture, and, as a result, add to moisture containment in the road base material. These berms will be removed and replaced with guard rail.

It goes without saying that traffic safety on the road will be greatly improved with the installation of new guard rail.

Vegetation: The overall condition of vegetation adjacent to the road should be greatly improved as a result of not blowing gravel-contaminated snow from the road onto the downslope.

Drainage from the road area, which eventually is deposited on the downslopes, will be less harmful because of the reduction of suspended sediment in the runoff.

Construction impact on existing downslope vegetation in the areas of the high fills will be minimized through the application of bin walls.

Prior to construction, all salvageable topsoil will be removed and stockpiled in approved locations for re-distribution after construction is completed.

Signage: With improved signage along the road, vehicle safety will be improved through the installation of speed and hazard signs. Also, "deer crossing" signs will afford increased protection to wildlife in the area by alerting drivers to such an existence.

Disturbed Area Drainage: By paving the roads leading up to the Belina No. 1 pad and down to the Belina No. 2 pad, and lining the adjacent ditches, less erosion will occur in these areas

and disturbed area drainage will be more positively directed to the sediment pond.

At the conclusion of the construction activities, re-vegetation of disturbed areas will occur during the earliest possible appropriate season.

In any undertaking of this magnitude, there are many loose ends that require attention as the project progresses, and I'm sure this project will require additional informational submittals as we advance. I would hope that any possible omissions from this request, or questions resulting from the same, can be handled by subsequent correspondence and site visits, and thus, preclude approval delay at this time.

Your expeditious handling of this matter will be appreciated, considering the anticipated beginning construction date of May 23, 1983.

If I may be of service to you in your review of this request to commence construction, please feel free to contact me.

Sincerely,

T. G. Whiteside
Chief Engineer