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Memorandum

DEC 06 1983

DEC 2 1983

TO: Valley Camp Files
FROM: Sarah Bransom
SUBJECT: Meeting Report

DIVISION OF
OIL, GAS & MINING

Two meetings were held in Denver on December 1, 1983 with Valley Camp to discuss the draft final DOA. (See attached attendance sheet) The following is a summary of the meetings.

1. UMC 784.13 (b)(3) Backfilling/Grading

The applicant feels they have responded to this question in previous submittals. Engineering Sciences(ES) will re-check the deficiency and the 1980 submittal for the reclamation schedule.

2. UMC 784.15 Post Mining Land Use

The applicant has made two attempts to get comments from the landowners regarding the proposed post mining land use and leaving the road as a permanent structure. OSM explained that there were three options: 1) provide a plan to reclaim the road and adjust the bond. If the landowner wants to have the road after mining ceases, the plan can be adjusted. 2) Valley Camp should demonstrate that the landowner is willing to accept the responsibility for maintaining the road, 3) Valley Camp could leave the proposal as is and have OSM make the call as to the stability and compatibility of the road with the post mining land use. Valley Camp requested that OSM send staff to the mine to assess the stability of the road. No commitment was made by OSM to do so. Valley Camp stated that they would provide the "as-builts" if necessary. They will call Al Klein next week to discuss which option they have selected.

3. UMC 784.20 Subsidence Control Plan

Valley Camp objects to providing more information on the subsidence question (i.e. leaving the stream on a pedestal). They agreed to provide a narrative and a graph showing the angle of draw as it relates to valley and pillar width.

4. UMC 784.21 Fish and Wildlife Plan

After clarification, the applicant agreed to further address the reclamation of the riparian zone on Whiskey Gulch. Density of tree and shrub plantings, composition, general drawings of plant location will be provided.

5. UMC 784.14 Ground Water

The applicant agreed to provide a plan to maintain the baseflow into Eccles Creek during and after mining. They stated that there are two reservoirs in the mine along the fault zone which will be maintained as a water source.

6. UMC 817.52 Ground Water Monitoring

The applicant did not object to the requirement for in-mine monitoring; however they were concerned that it could not be done monthly due to the weather (e.g. water freezing in the mine 7-9 months during the year). OSM agreed to consider this problem.

7. UMC 817.53 Water Rights and Replacement

The applicant objects to replacing water in the three identified springs mainly because the water rights belong to Valley Camp. They will, however, make a commitment to replace this water as necessary.

8. UMC 817.97 Protection of Fish, Wildlife...

The applicant does not know how to respond to OSM's requirement that springs important to wildlife be replaced and/or monitored. OSM/ES explained that since the applicant had not provided the required information throughout the last two years, that we cannot accurately assess the impacts on wildlife due to loss of springs via subsidence. Specifically, OSM required information of location of wetlands and documentation of wildlife utilization of seeps and springs. This information is still required.

9. UMC 784.13 (b)(4) Topsoil

The applicant must provide an explanation as to the discrepancies in the soil samples. Volumetric calculations of the soils proposed for reclamation are critical and will be provided by the applicant.

The applicant was informed that several issues had surfaced during the Technical Analysis of the permit application. These issues included: 1. identification of terrace slopes around the Belina Portals that were in excess of 2H:1V; 2) the surface water monitoring plan has been modified by the applicant and cannot be approved; and 3) sedimentation ponds no. 2 and 3 are not in compliance with UMC 817.46.

The applicant was informed that the final DOA would be forwarded to them as soon as possible. The operator committed to providing the required information by 1/3/83.

Meeting Dec. 1, 1983 2:15 PM at Engineering
Science

Name	Representing
MIKE BISHOP	Engineering Science
SCOTT GRACE	OSM - HYDROLOGY
Mark Humphrey	OSM
Steve Manger	OSM
JOHN S. KIRKHAM	VALLEY CAMP (VALLEY, RILEY)
WALTER L. WRIGHT	Valley Camp
TREVOR G. WHITESIDE	VALLEY CAMP
Ed Royk	ES

Morning session also included:
Mel Shilling- OSM
Allan Klein- OSM