



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

March 4, 1983

Ms. Sarah Bransom  
Western Technical Center  
Office of Surface Mining  
Brooks Towers  
1020 15th Street  
Denver, CO 80202

RE: ACR Addendum Review by  
Envirosphere Company for the  
Belina Complex  
Valley Camp of Utah  
ACT/007/001 ✓  
ACT/007/014  
Folder No. 2

Dear Ms. Bransom:

The Division has received and reviewed the letter of February 25, 1983 from Envirosphere Co. to OSM containing Envirosphere's response to the adequacy of the Gates Engineering Report submitted by Valley Camp of Utah as part of the ACR addendum for the Belina Complex. The circuitous manner in which deficiencies are brought out does not clearly indicate their adequacy nor does it adhere to the format required by the Division. Technical adequacy or apparent completeness is not differentiated. The company is aware of the form of presentation required by the Division via a letter, dated August 18, 1982 from Pam Grubaugh-Littig to OSM, which contained an example of the format.

In addition, the final paragraph of Envirosphere's comments suggests that the Division assume associated review responsibilities to assist their determination of adequacy. This is unacceptable and serves only to further substantiate their negligence in document preparation. The company does not appear to be strongly pursuing the precepts of the contract to the satisfaction of the Division.

Please review the situation further and regard this letter as a recommendation to cancel Envirosphere's contract unless a more responsible and thorough review is to be undertaken by the company. I would suggest, however, that Envirosphere be apprised of the situation and afforded an opportunity to

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respond to our mutual concerns. If a few weeks longer were required to obtain a more reliable contractor, the final product may be worth the additional small increment of time taken for the changeover. Please keep us advised of your findings and any pending decision.

Sincerely,

A handwritten signature in black ink, appearing to read "James W. Smith". The signature is fluid and cursive, with a large loop at the end.

JAMES W. SMITH  
COORDINATOR  
MINED LAND DEVELOPMENT

JWS/TNF:lm

cc: Tom Tetting, DOGM

enclosure

**envirosphere  
company**

1617 Cole Blvd., Suite 250, Golden, CO 80401 • (303) 233-2133

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

RSL/slr  
encl.



## 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.