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STATE OF UTAH  
NATURAL RESOURCES  
Oil, Gas & Mining

Norman H. Bangerter, Governor  
Dee C. Hansen, Executive Director  
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January 28, 1986

Mr. Walter L. Wright  
President  
Valley Camp of Utah, Inc.  
Scofield Route  
Helper, Utah 84526

Dear Mr. <sup>Walt</sup>Wright:

Re: Meeting to Discuss Permit Conditions, Belina Complex,  
ACT/007/001, Folder No. 2 and 4, Carbon County, Utah

On January 13, 1986, you and your representative met with members of the Division's technical staff and administration to discuss the Division's July 22, 1985 letter reviewing Valley Camp's response to the permit conditions. This letter will serve to summarize the decisions that were reached regarding the various conditions.

Condition 1

The annual report needs to be a compilation and summary of the previous year's data only. A mass balance table of the major cations and anions should be added to the list of analyses to be done. The Division has determined that the criteria to establish a stabilized flow will be six consecutive consistent monthly samples.

Valley Camp's request for deletion of parameters should be addressed in response to the Division's soon to be distributed water monitoring guidelines.

Condition 3

An in-mine monitoring plan can be effectively worked out when representatives of Valley Camp and the Division meet to discuss how the new water monitoring guidelines apply to the Belina Complex.

Condition 4

It was determined that the concerns the Division has for subsidence of intermittent streams can best be handled through Valley Camp's ongoing subsidence monitoring program and the submittal of annual subsidence reports. Therefore, this condition is hereby signed off on by the Division.

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#### Condition 5

At this time the applicant needs to submit the results of the following chemical and physical analyses to help determine the nutrients and/or soil amendments required to appropriately devise the field site experimental plot design: ph, electrical conductivity (EC), saturation percentage, texture, calcium, magnesium, sodium, sodium adsorption ratio, total sulfur, calcium carbonate, acid-base potential (tons  $\text{CaCO}_3$ /1000 tons soil), nitrate nitrogen, potassium, and available phosphorus. The analyses must be done at one foot intervals within a specific sample site. The September 24, 1983 Ford Chemical data, page 1 of 2, may be sufficient if the analysis was done by depth.

Perimeter soil sampling near the coal pile on the Utah #2 pad is necessary to establish possible contamination to the soil material by coal fines and waste material.

When the analyses have been received Valley Camp must make a determination as to how much material will be available for reclamation, how much and what kind of material(s) should be used in the test plots, and any special handling techniques that may be required.

#### Condition 6

The Division will work with Valley Camp in designing experimental plots that can be implemented this year. An on-site meeting will be held when weather and site conditions permit. In the meantime, as snow conditions permit, Valley Camp will take soil samples as required under Condition 5. The Division also suggested that Valley Camp may want to submit a revision to the approved reclamation plan to lessen the number of seed mixes required and thus the number of experimental plots required.

#### Condition 7

##### Part 3

This section will be tied in with Valley Camp's groundwater monitoring plan. If any information is currently available regarding the source of springs in the area, Valley Camp should compile it and provide it to the Division within 30 days of receipt of this letter.

##### Part 4

The applicant has committed to replace perennial springs important to wildlife and to replace water lost to any user. The Board of Oil, Gas and Mining has repealed UMC 817.54. However, the

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Division is still mandated to protect the prevailing hydrologic balance and the current and potential land uses of a mine plan area in accordance with other portions of the regulations. Valley Camp's commitment to replace water in Appendix N, pp. 41-42, Volume VI of the Mining and Reclamation Plan should be reworded and resubmitted to reflect this change in regulations.

Should any significant diminution in water flow occur due to mining, the Division and Valley Camp will meet to discuss the best way to mitigate the loss.

Condition 9

Due to the technical nature of the Division's response to Valley Camp's plan addressing this condition, Condition 9 was not discussed at the meeting. It was agreed that Division staff would meet with Valley Camp and its consultants on-site when conditions permit to further discuss the reclamation of the haul road.

Please contact me or Susan Linner if your understanding of the results of the meeting differs in any way. We realize that resolution of some of the conditions will not be done quickly, but we will work with Valley Camp to expedite the process wherever possible.

Best regards,



Dianne R. Nielson  
Director

SCL:jvb  
cc: R. Holbrook  
K. May  
L. Braxton  
S. Linner  
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