



STATE OF UTAH
NATURAL RESOURCES
Oil, Gas & Mining

Norman H. Bangerter, Governor
Dee C. Hansen, Executive Director
Dianne R. Nielson, Ph.D., Division Director

355 W. North Temple • 3 Triad Center • Suite 350 • Salt Lake City, UT 84180-1203 • 801-538-5340

February 6, 1987

TO: Coal File
 FROM: *SCC for* Holland Shepherd, Reclamation Specialist
 RE: DOGGM and OSM Site Visit and Mid-term Review of the Belina Complex, ACT/007/001, Folder No. 2, Carbon County, Utah

On January 29th 1987, myself and three individuals from the Office of Surface Mining: Mr. John Kathmann (AFO), Mr. Vernon Maldonado (WTC), and Mr. Henry Austin (AFO), met in Price, Utah to discuss the current status of the Belina mid-term review and associated permit conditions. This meeting also included a site visit to the Belina mine.

This memo summarizes information discussed at the above mentioned meeting and is intended to answer some of the questions, concerning the status of various permit conditions and other concerns, related to the Belina mid-term review. These concerns were outlined in a letter which was to be sent to DOGM from OSM, a draft copy of which was given to me during the January 29th meeting.

The first item I would like to address concerns sediment pond inspections. The operator is currently inspecting the sediment ponds on a quarterly basis. Quarterly inspections were initiated in the 2nd quarter of 86. A letter from DOGM was sent to the operator on May 15, 1986 requesting that the operator change from one inspection per year to quarterly inspections. The operator replied to the Division's request in a letter dated June 5, 1986, indicating the acceptance of the new inspection frequency.

A second concern has to do with the operator's topsoil stockpile located at the upper Belina site. The topsoil stockpile is located in a steep canyon above the Belina portals and mine facilities. The area is heavily vegetated above and below the stockpile. Earlier concerns were related to the stability of the stockpile and reluctance of the operator to seed it. I have indicated in my November 18, 1986 inspection report that the operator had seeded the topsoil material and improved the berm on the downhill end of the stockpile. The success of the seeding has yet to be verified; however, as long as the operator maintains the current berm and strawbale combination at the toe of the stockpile, there should be no problem with the loss of material. Heavy vegetation above the stockpile will act to buffer the stockpile

Memo to Coal File
February 6, 1987
Page 2

from overland drainage during large precipitation events. Heavy vegetation below the stockpile will help retain any material that might pass through a breached berm during a large precipitation event. According to Mr. James Leatherwood, Division Soils Specialist, language in the operator's current plan is vague concerning the stabilization and protection of the topsoil stockpile. He told me that he would ask the operator during this mid-term review to update information concerning the topsoil stockpile.

A third concern has to do with the installation of a mine water bypass pipe. The bypass pipe was installed last summer at the outlet to the Belina mine water pond and has the same NPDES discharge location as the mine water pond (pt. 005). Water from the bypass pipe originates from an abandoned section of the Belina mine, and does not pass through the mine water filter pond before discharging. I have observed and sampled the discharge during a past inspection and found effluent levels to be well under that specified on the operator's NPDES permit. The operator's water analyses also verifies the acceptability of the effluent. The operator was granted approval, for the operation of this bypass facility, from state Health in a letter dated October 14, 1986; and granted approval from DOGM in a letter dated October 15, 1986.

A fourth concern is that of the installation of a wash bay and waste oil tank facility at the Belina site. The Division granted the operator a conditional approval for the above facility, along with a conditional approval for a substation retaining wall, at the Belina site, on November 17, 1986. The operator submitted the required material (maps indicating the location of the new facilities) to satisfy the conditional approval, to the Division, on November 20, 1986.

A fifth concern regards the operator's surface water monitoring parameters. I spoke with Rick Summers, Division Reclamation Hydrologist, regarding this matter and was told that the current parameters will be updated during the mid-term review. Mr. Summers explained, that oil and grease will probably be added as they are now included on the DOGM operational water monitoring guidelines. He also mentioned that he would review the current data and make a determination as to whether or not some other parameters, no longer useful, might be excluded from the operator's monitoring program.

A sixth concern regards the turn-in area located at the junction of the Eccles Creek road and the Belina haul road. This area has remained a point of contention between the regulatory authority and the operator for quite a while. Because of its location it has been considered somewhat of a no-man's-land ever since the state upgraded the Eccles Creek road several years ago.

Memo to Coal File
February 6, 1987
Page 3

The operator contends that this area is mostly state highway right-of-way while the Division has been saying that it is not. The actual legal right-of-way has yet to be established through the acquisition of the original engineering plans for the state road. I have not, at this time, been able to find these plans. I have searched for them at the Utah Department of Transportation. One of the local mines (Skyline) in the Scofield area, is said to have a copy of the Boyle Engineering report which contains the specs for the Eccles Creek road.

Once a determination can be made as to the legal right-of-way, the operator's responsibility for this area can be made clear. If it happens that the operator is in fact responsible for the area it may then be possible to affect a permit boundary change for the area in question. It was agreed among those attending the site tour on January 29th, that material pushed off, or draining off this turn-in area was negligible in respect to material pushed off or draining off the state road adjacent to it. This does not include; however, material (snow and debris, or road drainage) originating from the operator's haul road.

Another concern having to do with the same area concerns drainage coming down off the Belina haul road. A stretch of road approximately 100 yards in length, starting from the last drop drain and cross culvert to the bottom of the haul road, drains across the haul road turn-in and exits into Eccles Creek. Water from the road stays in a drainage ditch until it reaches the creek.

From past observations, during precipitation events, the question has arisen as to whether or not the sediment controls at the bottom of the drainage ditch are adequate enough to control sediment loading of the creek. Currently drainage is controlled by three tiers of strawbales staked into the ditch. The consensus of the group attending the January site tour was that information concerning this area would be relayed back to OSM and DOGM hydrologists who would then make a determination as to what should be done with the area. It was agreed that the area should be left as is, or that only minor upgrading of the sediment controls would be made. This was based on the consensus that the drainage area in question was not overly extensive.

Other concerns that were indicated by OSM personnel involved the resolution of several permit conditions. The following summarizes the status of these conditions:

- 1) Conditions # 5 and # 6 have to do with a soil redistribution plan and the implementation of revegetation field trials. According to Mr. Lynn Kunzler, Division Biologist, condition #6 will be reviewed during a joint

Memo to Coal File
February 6, 1987
Page 4

OSM-DOGM field tour of the Belina site in June of 87. According to Mr. James Leatherwood, condition #5 will be addressed in the current mid-term review.

2) Condition # 9 concerns a reclamation plan for the Belina haul road. According to Rick Summers, the haul road reclamation plan will be reviewed in March of 87.

3) Conditions # 3 has concerns about the initiation of an in-ground water monitoring program. According to Mr. Dave Darby, Division Engineering Geologist, the operator's in-ground water monitoring program was to have been submitted with his current mid-term review package.

4) Conditions # 4 and # 7 have to do with subsidence monitoring relative to intermittent stream channels and a subsidence control plan for riparian habitats. According to Mr. Dave Darby, this information was to have been submitted, by the operator, with the current mid-term review package.

re

cc: John Kathmann, OSM Albuquerque
Sue Linner
0695Q-10-13