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State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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File

August 8, 1988

CERTIFIED RETURN RECEIPT REQUESTED
P 879 596 427

Mr. Robert Hagen, Director
Albuquerque Field Office
of Surface Mining
Reclamation and Enforcement
Suite 310, Silver Square
625 Silver Avenue, S. W.
Albuquerque, New Mexico 87102

Dear Mr. Hagen:

Re: TDN X88-02-107-8, Valley Camp of Utah, Belina Complex,
ACT/007/001, Folder #5, Carbon County, Utah

This letter responds to the above referenced Ten-Day Notice, the certified copy of which was received at the Division's offices August 2, 1988.

Number 1 of 1 was issued for failure to pass surface drainage from disturbed areas through a sedimentation pond (817.42 (a) (1)).

Response: As pointed out in the July 7th, 1988 inspection report, the Division is aware of this situation and considers it to be a permit defect which was overlooked by both DOGM and OSM when issuing the permit and as such should be handled under the guidelines of Directive INE-27.

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All of the areas in question have alternate forms of sediment control in the form of straw bales, sediment basins, berms, vegetation, or asphalt and should qualify for small area exemptions. During the July 7th inspection, the operator was given 90 days to submit plans for addressing three of those areas, in accordance with the reasonable time policy (the mine office, the pumphouse below pond 004, and the water tank area above the Belina mine.) The other two areas (Topsoil Stockpile and Substation area) were discussed during the oversight inspection with the operator who felt that plans could be submitted for all areas within the 90 day time frame.

I concur with your field representative that changes to the MRP are required. In as much as the Division is working with the operator to mitigate these defects in the MRP within DOGM's "reasonable time policy", it is felt that a violation is unwarranted at this time, and none will be issued.

This inspection consumed two full days at the mine site and portions of a third. Typically DOGM and OSM Complete inspections at the site have been accomplished in about one third of the time utilized on this oversight inspection. It would appear that your staff is satisfactorily reducing the number of inspections based on the mandate to do so, but I fear this last inspection may be an indicator that as much time may be given to a single inspection as was previously allocated to two inspections. I hope this will not prove to be the case.

Sincerely,



Lowell P. Braxton
Administrator
Minerals Resource Development
and Reclamation Program

c1

cc: K. May
S. Linner
P. F. O.
B. Barnum (Valley Camp)

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