

VALLEY CAMP OF UTAH, INC.
Scofield Route
Helper, Utah 84526
(801) 448-9413

Mr. Daron R. Haddock, Permit Supervisor
 Utah Division of Oil, Gas & Mining
 355 West North Temple
 3 Triad Center - Suite 350
 Salt Lake City, Utah 84001

July 31, 1993

RE: Final Submittal of the Historic PAP and the August 1993 MRP.

Dear Daron:

Included herein are 1) our remaining responses to yet unanswered Division of Oil, Gas and Mining questions raised with respect to the previously submitted Mine Permit Renewal Application (PAP) and 2) our submittal of a Final Permit Application Package (PAP) and Mining and Reclamation Plan (MRP). With regards to item 1, only those questions which were not answered in the submittal letter dated February 11, 1993 will be addressed herein.

UDOGM team members for which completed responses are provided herein are shown in Table 1. It is the understanding of Valley Camp of Utah, Inc. that responses to questions posed by team members not shown in Table 1 were answered previously in the February 11, 1993 letter response.

TABLE 1.
Comment Letters Received for Which Completed Responses are Provided.

| LETTER DATE | SUBMITTED BY | TITLE |
|---------------|------------------|------------------------------|
| June 8, 1992 | Wayne H. Western | Reclamation Engineer |
| July 21, 1992 | Priscilla Burton | Soils Reclamation Specialist |

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**DIVISION OF
OIL GAS & MINING**

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RESPONSE TO RECLAMATION ENGINEERING CONCERNS
WAYNE H. WESTERN letter of June 8, 1992

R645-301-522. Coal Recovery.

The statement "The Valley Camp operation originated under the Coal Exploration and Mining Operations Rules, 30 CFR 211, which governed operations for the exploration, development, and production of coal from Federal lands in accordance with the requirements of the Mineral Leasing Act of 1920 and its amendments. In 1983 Valley Camp provided Minerals Management Service with a cross-reference index from the State regulations to the 30 CFR 211 regulations to aid in their review of the MRP. The BLM office for the Price River Resource Area approves all Valley Camp mining plans and modifications, as well as inspects the mine(s) to assure there are no detrimental effects on recoverable reserves and that Valley Camp satisfies the requirements of maximum economic recovery of the federal coal resource.", has been added to second paragraph after "Also see R614-301-523."

The Division should refer to the 1984 OSM Technical Analysis, Chronology of Events, Date; February 10, 1977, Event; USGS issues 211 permit for Belina No. 1 mine covering the existing Belina #1 (Upper O'Connor Seam).

R645-301-525. Subsidence.

Valley Camp of Utah, Inc. believes that concerns related to renewable resource lands have been adequately addressed within PAP Sections 200, 300, and 700. Commitments have been made by the applicant to monitor subsidence via pedestrian surveys annually. Transit surveys will be conducted on new lands prior to mining at which time rebar stations will be established for future subsidence monitoring. No additional information related to pillar stability is available.

R645-301-526. Mine Facilities.

Those Pre-1977 existing structures which are currently being utilized by Valley Camp have been modified to meet the regulations. Valley Camp is of the opinion UP&L power lines, Questar Pipeline Company gas pipe lines, and the D&RGW railroad tracks present condition meet the Public Service Commission standards. Valley Camp does not believe this permit needs to be cluttered with the finite details of existing structures, some of which were designed and built over 100 years ago and are not relevant.

R645-301-529.100. Exposed Underground Openings.

The statement "When approaching a suspected or known old workings (abandoned mine), MSHA has specific mandatory regulations which this operator is obligated to follow." has been changed to "When approaching a suspected or known old workings (abandoned

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mine), MSHA Statutory Provisions of the 30 CFR Chapter 1, Subpart R-Miscellaneous, 75.1701 Abandoned areas, adjacent mines; drilling of boreholes, will be followed."

R645-301-542.100. Reclamation Schedule.

A detailed reclamation schedule, detailed reclamation cost estimates, supporting data and engineering calculations are presented in the MRP in Appendices R-2 and R-3.

R645-301-542.300 to R645-301-542.500. Final Surface Configuration.

N/A

R645-301-542.800. Reclamation Cost Estimate.

Detailed reclamation cost estimates, supporting data and engineering calculations are presented in the MRP in Appendices R-2 and R-3.

**RESPONSE TO SOILS RECLAMATION CONCERNS
PRISCILLA BURTON letter of July 21, 1992**

R645-301-240. Reclamation Plan.

Deficiency 1

Map 820.110 was not completed nor submitted in the 1990 Midterm Permit Review and is not planned for submission within current or future PAP or MRP plans. Required reclamation mapping is provided within the MRP dated August 1993. The performance bond covers the entire permit area as defined by numerous maps within the PAP and MRP. No bond releases have been achieved to date since the mine is not in reclamation.

Deficiency 2

The MK report is in error related to the acres of roadway which will not be topsoiled. All reclamation will be accomplished with in-place material at the toe of slopes as stated in the PAP.

Deficiency 3

The "Proven" VSM used as cover material over the regraded areas has been quantified along with appropriate cost estimates within the Reclamation Plan included as part of the MRP.

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Deficiency 4

Section 242.100 has been modified to state that slope angles constructed during reclamation will not exceed those of the surrounding hillsides, that reclamation contours will match those found naturally at the point of contact, and where possible, reclaimed contours will be constructed at slope angles less than those found naturally.

Deficiency 5

Due to the steep slope angles involved with the Belina Complex, subsoil ripping prior to application of VSM may result in slope failure and therefore cannot be specified prior to reclamation, but will be determined at that time. A similar statement has been added to Section 242.100.

Deficiency 6

See the added text to Section 231.100.

R645-301-242. Soil Redistribution.

Deficiency 1

What is described in the "Test Plot Program - 1987" was agreed upon by OSM, UDOGM and Valley Camp and all available information is included within the PAP. See permit Section 341.300.

Deficiency 2

See Map 231.300 entitled "Topsoil Substitutes & Supplements - (Vegetation Supporting Materials)".

Deficiency 3

This information is provided as part of the new Reclamation Plan included as part of the MRP.

Deficiency 4

Section 231.200 has been modified to contain the specific statement requested.

Deficiency 5

As discussed with Prescilla Burton, VSM will be derived from existing fills. No differentiation is possible as described in Section 231.100.

Deficiency 6

The planned excavation depth is 3" below the root zone as discussed within Section 231.200.

Deficiency 7

A volume or depth of topsoil is not applicable with these pre-law conditions. Valley Camp has committed to test these materials prior to revegetation.

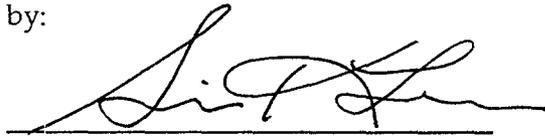
Deficiency 8

Text has been modified as appropriate in Section 231.100.

Sincerely,

VALLEY CAMP OF UTAH, INC.

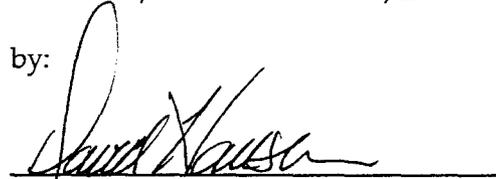
by:



Steven K. Tanner
Environmental Coordinator

HANSEN, ALLEN & LUCE, INC.

by:



David E. Hansen, Ph.D., P.E.
Principal