

0017



# State of Utah

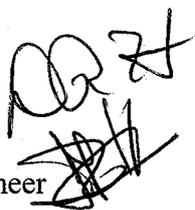
DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF OIL, GAS AND MINING

Michael O. Leavitt  
Governor  
Kathleen Clarke  
Executive Director  
Lowell P. Braxton  
Division Director

1594 West North Temple, Suite 1210  
PO Box 145801  
Salt Lake City, Utah 84114-5801  
801-538-5340  
801-359-3940 (Fax)  
801-538-7223 (TDD)

September 2, 1999

TO: File

THRU: Daron Haddock, Permit Supervisor 

FROM: Randy Harden, Sr. Reclamation Engineer 

RE: Pre-SMCRA Highwalls, Lodestar Energy, Inc., White Oak Mine, ACT/007/001-AM99C, Folder #2, Carbon County, Utah

**Summary:**

In a letter dated August 20, 1999, Lodestar Energy Company submitted a letter requesting that revisions to the reclamation plan be made for the White Oak permit. The revisions were regarding the elimination or retention of the pre-SMCRA highwalls at the site.

The revised information for the reclamation plan was found to be insufficient to approve the changes as they were submitted. The following analysis provides a detailed review of those proposed changes.

Analysis:

**BACKFILLING AND GRADING**

Regulatory Reference: 30 CFR Sec. 785.15, 817.102, 817.107; R645-301-234, -301-537, -301-552, -301-553, -302-230, -302-231, -302-232, -302-233.

Cut and fill calculations were presented in the proposal which contain a typographical error. The fill(CY) for the Surface Facilities are should be 180,175 rather than 108,175 as indicated in the table.

No reference was made to the drawings and/or cross sections that were used in determining the volumetric data presented in the table of cut and fill calculations. Rather, page R-16 of the proposal states that on Drawing R645-301-527, Sheets 6 through 14, the approved reclamation design anticipates retention of some of the pre-SMCRA highwalls and are indicated as such on those drawings. If volumetric calculations were made from the current set of

reclamation drawings, which indicate highwall retention, then the amount of fill necessary to eliminate those highwalls has not been incorporated into those calculations. These drawings must be revised to support the indication in the plan that the pre-SMCRA highwalls would be eliminated.

Although the reviewer understands the intent of the proposed changes to the reclamation plan, the information is not sufficiently clear and concise to demonstrate reclamation and the elimination of the pre-SMCRA highwalls. The proposal should be revised to include the following information:

1. Drawings R645-310-527 Sheets 6 through 14 should be revised by recontouring those areas necessary to eliminate the pre-SMCRA highwalls as intended. Notation on those areas indicating retention of such highwalls on those drawings should also be eliminated. These revised drawings must be submitted with the proposal.
2. Cross-sections must be provided at the center of each highwall area which show the existing surface configuration, the post-reclamation configuration, and, if possible, the pre-mining surface configuration for each highwall. (The map scale and the contour interval of the reclamation drawings in plan view are not sufficient to show the highwall areas in detail.) Such cross-sections
3. Cut and fill calculations should be accomplished and provided using the revised reclamation drawings. The areas indicated in the cut and fill table should also be delineated on the drawings to show the location and the extent of those areas from which the calculations were made.