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State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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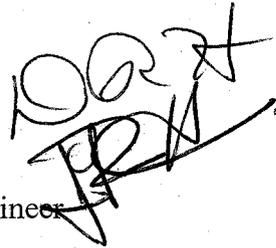
December 16, 1999

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

A handwritten signature in black ink, appearing to be 'Randy Harden', is written over the 'THRU' and 'FROM' lines of the memo.

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. Information in that proposal was found to be insufficient to approve the changes as they were submitted.

Lodestar re-submitted information regarding AM99C which was received by the Division on November 15, 1999. With respect to highwall elimination in the mine facilities area, it is recommended that the Division Approve AM99C. The bond amount for reclamation due to the change in backfilling and mass balance calculations is not considered significant to require an adjustment to the bond amount for this permit amendment.

The following analysis provides a detailed review of those proposed changes.

TECHNICAL ANALYSIS:

RECLAMATION PLAN

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 are presented in the proposal as a part of map R645-301-527 Sheet 12, Reclamation Surface and Cross Sections. These calculations indicate that there is sufficient material available for the proposed backfilling and elimination of all highwalls within the mine facilities area. Fill yardage requirements for the mine facilities area totals about 210,000 yards with available fill within about 3% of the available cut yards, based on volumes calculated on a 25 ft grid using the Softdesk civil/survey design package. Minor adjustments during reclamation backfilling and grading operations should easily accommodate cut and fill needs.

Map R645-301-527 Sheet 12, Reclamation Surface and Cross Sections, clearly shows the existing and planned contours of the area for reclamation. Section through the portal highwall areas are included on the drawing and also clearly show that the entire highwall area will be eliminated by backfilling.

Minor corrections were also made within the text of the plan regarding maps numbering and also to clearly state that, "No highwalls are planned to remain upon final reclamation within this area," as noted on Page R-17 of 37 in the proposed changes.

Consequently, all concerns and deficiencies noted by the Division in the previous review of the proposal have been met and the information in the proposal is found to meet the information requirements regarding highwall elimination.