

March 17, 2003

TO: Internal File

FROM: Dana Dean, P.E.; Senior Reclamation Hydrologist/Team Lead

RE: Response to N03-46-1-1 (Stipulation #6), Lodestar Energy, Inc., White Oak Mine, C/007/001-AM03A

SUMMARY:

The Division of Oil, Gas, and Mining (The Division) issued Lodestar Energy, Inc (the Permittee) a permit to conduct surface mining at the White Oak Mine on October 26, 2001. Attachment A of the permit contained nine Permit Conditions. Permit Condition #6 required Lodestar to do two things by January 26, 2002:

- 1) Remove all references to construct a 1200-foot section of road because of the landowner's desire to construct it themselves, or to modify the lease agreement, and;
- 2) Provide comments from the landowners concerning the postmining land use for Section 30, Township 13 South, Range 6 East.

The Division granted several deadline extensions because Lodestar was unable to get the necessary information from the landowners. Finally, the Division issued a Notice of Violation (N03-46-1-1) to Lodestar for not meeting the requirements of Permit Condition #6 in a timely manner.

Lodestar submitted an amendment to the Division on February 7, 2003 removing all references to the construction of the 1200-foot section of road.

Information found in the proposal meets the minimum requirements of the regulations.

The Division should approve the amendment and incorporate it into the MRP.

TECHNICAL MEMO

TECHNICAL ANALYSIS:

RECLAMATION PLAN

ROAD SYSTEMS AND OTHER TRANSPORTATION FACILITIES

Regulatory Reference: 30 CFR Sec. 701.5, 784.24, 817.150, 817.151; R645-100-200, -301-513, -301-521, -301-527, -301-534, -301-537, -301-732.

Analysis:

Reclamation

The Permittee plans to construct an access road through the reclaim area and maintain it until revegetation is complete. Revegetation will proceed down grade and the Permittee will reclaim the access road as work progresses toward Eccles Canyon.

Retention

The Permittee plans to retain the jeep trail from Boardinghouse Canyon above the surface-mined area. The trail existed pre-mining and will provide access to the site for maintenance and inspection through bond release.

The landowner will install a jeep trail across the reclaimed area after bond release according to a Supplemental Agreement signed February 16, 2001 (see Appendix 1-2 of the MRP).

Findings:

Information provided in the application meets the minimum requirements of this section of the Regulations.

MAPS, PLANS, AND CROSS SECTIONS OF RECLAMATION OPERATIONS



Regulatory Reference: 30 CFR Sec. 784.23; R645-301-323, -301-512, -301-521, -301-542, -301-632, -301-731.

Analysis:

The Permittee submitted several maps, which were changed to reflect the removal of the 1200-foot section of road mentioned in Permit Condition #6. They are:

- R645-301-242 - Topsoil Redistribution
- R645-301-527 Sheet 13 - Final Reclamation Contours
- R645-301-527 Sheet 12 – Initial Reclamation Contours
- R645-301-521.150 Sheet 4c of 4 – Surface Facilities After Initial Reclamation

The Permittee made no other changes to these maps.

The Permittee included two other maps (Figure 9-3 – Temporary Spoil Storage; and R-11 Sheet 3, Spoil Backfill and Reclamation Details) in the amendment, however neither included the road to begin with and no changes are apparent to either map.

Certification Requirements.

A Professional Engineer, registered in the State of Utah has certified each map as required.

Findings:

Information provided in the application meets the minimum requirements of this section of the Regulations.