



STATE OF UTAH
NATURAL RESOURCES
Oil, Gas & Mining

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January 13, 1988

Ms. Jodi G. Belviso
Blackhawk Coal Company
P.O. Box 700
Lancaster, OH 43130

RE: Mid-Permit Term Review, Willow Creek, ACT/007/002,
Carbon County, Utah

Dear Ms. Belviso:

The Division has received your letter, dated December 30, 1987, regarding the Mid-Permit Term Review (MPTR) comments of October 14, 1987. Although a thorough analysis of the response to each individual comment has not been made to date, there are some general issues and concerns which need to be clarified at this time.

First, Blackhawk Coal Company's (BCC) decision to remove the request for new permit areas from the resubmitted Mining and Reclamation Plan (MRP) should make the MPTR process simpler. However, all references to additional areas outside of the current permitted area will need to be removed from the MRP before the plan can be considered current and concise.

Also, it is not Division personnel's recollection that BCC was told that no additional information would be required during the MPTR process. The MPTR is being conducted under the Division's Mid-Permit Term Review process of July 1986, of which you received a copy at the initiation of the review. Another copy is enclosed for your convenience. The policy allows the Division to request additional information to make the MRP current, complete, technically up to date, and in compliance with current Division policy and rules. Information requested from BCC during the MPTR process is in concert with what has been required of (and received from) other companies undergoing MPTR review.

Current Division policy requires cutslopes, highwalls and outslopes of fills to be considered as disturbed areas. Since the Willow Creek site is inactive, these areas do not need to be delineated at the present time on the ground, but they do need to be

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shown as disturbed areas in the MRP and reclamation for those areas covered in the Reclamation Plan and for bonding calculations.

At the current time, the Division will require no further information on pond certifications. The Division is currently developing a policy to allow for uniformity of pond and road certifications among all operators, which may require further submittals from BCC in the future. However, BCC will need to show that the ponds are stable.

The Division will finalize review of the technical responses as soon as possible and notify you of the adequacy of the responses and of all information that needs to be incorporated into the MRP, to finish the Mid-Permit Term Review process.

Should you have questions regarding this matter, please contact me or Susan Linner.

Sincerely,



Lowell P. Braxton, Administrator
Mineral Resource Development and
Reclamation Program

jr
Enclosure
cc: D. Darby
✓S. Linner
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