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DIVISION OF OIL, GAS AND MINING

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September 27, 1989

TO: Price River Coal Pile Project: Phase 2
AMR/043/904/L

THRU: Mary Ann Wright, AMR Program Administrator *MAW*

FROM: Chris Rohrer, Project Manager *CR*

RE: Meeting with Coal Regulatory Program

On Monday, September 25, 1989 at 10:00 a.m. I met with Harold Sandbeck and Randy Harden of the DOGM Coal Regulatory Program's B Team. The purpose of the meeting was to discuss regulatory issues stemming from the AMR Program's improvement of a road through a permitted mine property owned by Blackhawk Coal Company. The road is used to access the Willow Creek Disposal Site for the Price River Coal Pile Project: Phase 2.

Harold explained that there were two regulatory issues involved. First is that the operator (Blackhawk Coal) would have to revise its MRP to reflect the changes made in the road. Harold said he would handle this. The AMR Program may be asked to provide some as-built drawings (typical cross-sections) for the revision. Second is that the AMR Program needs to maintain the drainage controls on the site during the project work. I explained that the road improvements planned were to widen the road in one place by cutting the bank on the west side and to reduce the grade in two segments. I said the drainage control structures had already been pointed out to the contractor and our on-site inspector and that we were planning to maintain them, although some swale ditches may be replaced by culverts where they cross the road. The ditch along the west side of the road would be rebuilt after the road was widened. Some road construction had started on the previous day.

Harold and Randy said the berm on the east edge of the road should be maintained to keep water off the outslope. The road should be sloped slightly towards the west to direct water to the ditch.

Randy said the existing culvert with elephant trunk will require straw bales at its inlet to trap silt. If the culvert has to be removed to improve the road, Randy should be consulted for further advice.

Harold and Randy were quite concerned about the swale ditch that sends water across the road to the lowest sediment trap near the gate. If this drainage across the road is maintained (either as an open swale ditch or through a culvert), then no further treatment is required. No treatment is required for the small watershed area below this ditch, though straw bales near the Willow Creek bridge were suggested.

Memo to File
AMR/007/907/L
September 27, 1989
Page 2

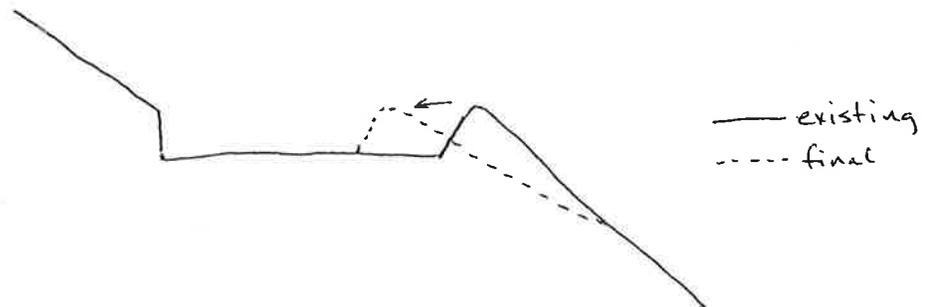
Harold and Randy had the following other recommendations: 1) that the contractor keep materials (straw bales, silt fence) on hand for routine maintenance and emergency sediment control as needed, 2) that straw bales be placed in the ditch along the road, and 3) that the Coal Regulatory Program be notified prior to winter suspension of work and/or final demobilization for a check of the drainage control structures.

I explained that the AMR Program work at the site would probably continue through next fall, as the road would be used for Price River Coal Pile Project Phase 3 and Willow Creek Phase 2 work. Reclamation of the road is not in the scope of the current contract with Ned Mitchell Inc. Harold and Randy said that when all work is completed the road improvement (widening) should be reclaimed by cutting back the outslope and moving the berm over towards the west as shown below, thus narrowing the road and reducing the steepness of the outslope. The disturbed outslope should be reseeded. Where culverts have been installed in swale ditches, the culverts should be removed and the swales reconstructed.

Harold is planning to visit the site Thursday morning, September 28. Lowell Braxton and Sue Linner are planning to visit the site on October 3.

Most of the recommended actions discussed at the meeting were steps the AMR Program had already started or intended to do. No major changes in procedure or in the scope of the project are called for. Continued vigilance and sensitivity to erosion are the main needs. Following the meeting I traveled to the project site and discussed the recommendations with inspector Jim Peterson. He had already anticipated the drainage problems and had arrived at the same solutions.

Recommended road reclamation (cross-section):



jcr
cc: Sue Linner
Harold Sandbeck
Jim Peterson
Ned Mitchell
AM79/61-62