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STATE OF UTAH
NATURAL RESOURCES
Oil, Gas & Mining

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December 24, 1987

Mr. Richard Allison
Castle Gate Coal Company
P.O. Box 449
Helper, UT 84526

RE: Mining and Reclamation Plan Update, Mid-Permit Term Review, Price River Complex, ACT/007/004, Carbon County, Utah

Dear Mr. Allison:

The Division has initiated a review of the resubmitted Mining and Reclamation Plan (MRP) for Castle Gate Coal Company's (CGCC) Price River Complex. The resubmittal was required as part of the Mid-Permit Term Review in order to bring the MRP up to a current status and to delete all reference to areas that are now controlled by Blackhawk Coal Company.

In reviewing the materials submitted by CGCC on June 19 and September 11, 1987, the Division has found major problems with the organization of the MRP, to the extent that it is extremely difficult to complete a technical review.

The following major organizational deficiencies have been identified:

1. There is no overall Table of Contents.

2. There is no regulation cross-reference.

3. Page numbers are not unique, which makes it impossible to cite deficiencies in the plan.

4. Major chapters are not delineated.

5. Appendices have been used improperly to contain plans and commitments, rather than baseline studies and calculations.

6. There is still reference in the text to properties now controlled by Blackhawk Coal Company.

7. There are still references in the text to Price River Coal Company.

8. Many maps and tables are of such poor quality that they are illegible.

9. References are made in the text to nonexistent maps.

10. There is no consolidated Reclamation Plan.

11. The MRP lacks specific commitments to plans of operation and reclamation.

12. The approved responses to all permit conditions have not been incorporated into the MRP.

To remedy these problems, CGCC will be required to submit a reformatted plan to address the above-referenced deficiencies before a thorough technical review can be conducted. Enclosed is a format the Division recommends for MRPs. It is set up in such a way that a regulation cross-reference can be easily developed and the operator can check to see if all pertinent regulations have been addressed.

The Division reviewers would like to meet with you prior to your initiation of the reformatting. Please call myself or Dave Darby to set up a meeting in the first couple of weeks in January, if possible. Specific technical issues that have been identified will also be discussed at that time.

Sincerely,

Susan C. Linner
Permit Supervisor/
Reclamation Biologist

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