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**AMAX COAL COMPANY**

A Subsidiary of AMAX Coal Industries, Inc.

Original - Mine File Act/007/004  
cc: R. Harden  
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January 6, 1992

**BELLE Ayr MINE**

Messrs. Randy Hardin and Rick Summers  
Utah Division of Oil, Gas, and Mining  
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Salt Lake City, UT 84180-1203

**RECEIVED**

**JAN 08 1992**

**DIVISION OF  
OIL GAS & MINING**

Dear Randy and Rick:

It was a pleasure for me to go back to Utah and once again experience the beauty of Salt Lake City and Southern Utah. The adage is really true that you don't know what you are missing until you have left. I want to thank you both for the amount of time you managed from your busy schedules to talk about Castle Gate. In my opinion the decisions we made provide a win-win situation for AMAX and the Division.

The decisions made by the Division and AMAX with respect to Approximate Original Contour (AOC) and highwall elimination are in harmony with what is being done in other states in which AMAX operates. I applaud your grasping of these issues and the direction you are steering the Utah coal industry. At this point I would like to restate the Divisions position with respect to highwalls and AOC which will be reflected in the postmining topography design for Castle Gate Mine.

Except with respect to those portions of a cutslope within 50 feet of each side of a portal, none of the cutslopes at Castle Gate Mine are highwalls that are subject to the highwall elimination requirements. Additionally, AOC does not require the elimination of cutslopes but the requirements can be met by grading the disturbed area to create a topography that blends into the undisturbed area and leaves land forms that resemble features of the surrounding terrain, such as natural cliffs and talus slopes. The postmining AOC must be compatible with the postmining land use.

I went through my notes taken during my four days in Utah and compiled a list of what AMAX has agreed to supply to the Division. Specifics which I found in my notes that apply to Sowbelly, Hardscrabble, Castle Gate and Crandall areas are as follows:

- 1) The Operations Contour map will be at a scale of 1" = 100' with 2' and 10' contour intervals.
- 2) The Postmining Reclamation map will be at scale of 1" = 100' with 2' and 10' contour intervals. Existing contours will be half-toned.
- 3) The Operations Contour map will show drainage control during the life of the mine.

Randy Hardin/Rick Summers  
January 6, 1992  
Page Two

- 4) The Postmining Topography map will show the Phases of Reclamation and drainage control necessary during reclamation phases.
- 5) Collection ditches need not be a site-specific design but generic for all areas.
- 6) Side channel designs will be site-specific for areas of drainage over 50 acres.
- 7) A generic design for ditches draining 50 acres or less will be used or the contours blended on topo map to show overland flow.
- 8) Profiles of ditches and cross sections of areas will not be necessary because of the level of detail provided in 1" to 100' scale maps.
- 9) Aerial photos at a scale of 1" = 200' will be sufficient.
- 10) The Operation Plan and Reclamation Plan maps will show the disturbed area boundary.
- 11) The pre-SMCRA disturbances will be shown on the aerial photos. The pre-SMCRA areas within the disturbed area boundary will also be shown.
- 12) Highwalls on the Operations map will be labeled. By agreement, the highwall definition applies to the area 50' to the left and right of a portal entry.
- 13) The highwall backfilling will be shown in detail by means of a critical cross section.
- 14) Cut slopes which are proposed to remain must have a stability analyses which may consist of a field reconnaissance and documentation of stability for soil type from a reputable source.

My notes also reflect agreement on information specific to each canyon as follows:

Sowbelly Canyon

- 1) The concrete portal remnants may be left in place for historical reference.
- 2) The main diversion on the south side of the canyon will be left in place where possible to minimize effects on the hydrologic balance.

Hardscrabble Canyon

- 1) Aerial photo scale is sufficient at 1" = 200' and title map "Surface Facilities and Pre-SMCRA Areas". (Use this title on all aerial photos.)
- 2) Map 3-22 will be merged with 3-1.
- 3) Cross section Maps 3.3-8A, B, C, and D will be deleted because of detail shown in 1" = 100' scale map.
- 4) Leave mesh at highwall and cutslope areas to stabilize slopes.
- 5) Show extent of backfilling at highwalls by providing a cross section.
- 6) Backfill at highwalls must be revegetated so no backfill slopes greater than 2:1 will be allowed.
- 7) The No. 4 Portal reclamation drainage will be controlled with alternative sediment control such as sediment control fences. Fences will be left until vegetation is established and effluent standards are met.
- 8) The drainage will be located down the middle of the draw which contains the No. 4 Portal.
- 9) There is not enough room for sediment ponds in Hardscrabble Canyon during reclamation, therefore, alternative sediment controls will be used such as sediment fences, mulch, ripped and roughened soil. The locations of alternative sediment controls will be located in the field by Division staff and AMAX Project Supervisor.

Castle Gate

- 1) Map 3.4-1 - Locate previously disturbed areas within disturbed area boundary.
- 2) The photo date needs to be put on the map.
- 3) Map 3.4-2 needs the disturbed area boundary line placed on the map.
- 4) Bold the sediment ponds on Map 3.4-2 so that they can be seen more readily.
- 5) The road to the refuse pile will be left mostly alone but talus slopes will be used when possible to make approximate original contour.

- 6) Make road drainage overland flow if possible. (The same should be done at Portal #3 and staging areas in Hardscrabble Canyon.)
- 7) Show new or use existing sediment ponds in Postmining Reclamation.
- 8) AOC is what is on the existing contour map other than road cuts.
- 9) Check the main drainage design for CGD-3 and CGC-8.
- 10) Leave the diversion in for Phase I reclamation.
- 11) AMAX will provide a reclamation treatment map for different plantings in Castle Gate area.

Addit #1

- 1) No ponds will be used in the reclamation plans. Alternative sediment controls will be used.
- 2) Tunnel under U.S. Highway 6 will be stowed on both ends.
- 3) Reclamation Channel will be shown down the middle of the area and drained down the highway ditch.
- 4) All of the diversions will be removed from the disturbed ground.

Gravel Canyon

- 1) Need Mass Balance Calculation for cover on refuse pile.
- 2) Provide postmining drainage contours.

AMAX is committed to meeting the submittal schedule for each area of the mine. Hardscrabble Canyon will be submitted by the 5th of February. The review of the submittal will begin by holding a meeting at the mine site and reviewing the plans for discrepancies with DOGM staff. DOGM staff will review the Hardscrabble Canyon submittal within two weeks after February 5 and provide written comments. The review will be limited to backfilling and grading and drainage control.

The next submittal date is the 15th of March for either Castle Gate or Sowbelly Canyon depending upon if weather conditions permitted the photographing of Sowbelly Canyon. AMAX will not work on reclamation details in these submittals until the Hardscrabble Canyon review by the Division is complete.

Randy Hardin/Rick Summers  
January 6, 1992  
Page Five

The 1st of May will be the last submittal.

The Division will review the existing material submitted by AMAX on Crandall Canyon at a later unspecified date. I have in my notes that AMAX will submit additional information on Crandall Canyon by the 1st of June. However, if a comment letter on the existing submittal has not been received from the Division in a timely maner, the June 1st date will slip.

I also have the following notes on Crandall Canyon maps:

- 1) Map 3.7-1 will be an aerial photo at 1" = 500' scale.
- 2) Maps 3.7-4A, B, C, D, 3.7-8A, B, C, D, E, F can be eliminated if contour map scale is 1" - 100'.
- 3) The section locations shown on Map 3.7-5 can be eliminated.
- 4) The leach field area should be at 1" = 100'.
- 5) The map which shows the road from U.S. Highway 6 to facilities area should be at 1" = 200' scale.

If you have any additions or corrections to these notes, please let me know.

Also of interest to you is the fact that AMAX has issued a purchase order to Olympus Aerial Survey in Salt Lake City to do the photography work at the Castle Gate Mine.

Although the four days which I spent in Salt Lake were long and intense, the time was well spent. I thoroughly enjoyed working with you and renewing old acquaintances.

Sincerely,



Richard H. Allison, Jr. P.E.  
Project Supervisor

RHA:vsn  
51302

cc: George Martin - ACI  
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