

0009



State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

Michael O. Leavitt
Governor
Ted Stewart
Executive Director
James W. Carter
Division Director

355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203
801-538-5340
801-359-3940 (Fax)
801-538-5319 (TDD)

November 14, 1994

TO: Daron Haddock, Permit Supervisor
FROM: Wayne H. Western, Reclamation Supervisor *WHW*
RE: Castle Gate Bond Release, Amax Coal Co, Castle Gate Mine, ACT\007\004, Folder 2, Carbon Co Utah

Synopsis of Proposal

On November 9, 1994 the Division visited the Castle Gate mine. The purpose of the technical visit was to evaluate reclamation work regarding bond release.

During the inspection Daron Haddock discovered one portal that was not backfilled correctly. The upper right-hand portion of the portal had not been covered. The amount of concrete exposed was approximately 3' by 2' by 1'. Warm wet air was flowing from the portal suggesting that the portal had not been completely sealed.

Analysis

R645-301-541.300 requires that all surface structures no required for continued underground mining activities and monitoring be removed and the affected lands reclaimed unless the structures have been approved as part of the most mining land use by the Division. The Division has approved the portal linings to remain provided they have four feet of cover material placed over them. The four feet of cover is needed for root penetration and soil moisture. There is no specific regulation that require four feet of cover over concrete; however the Division consistently made this stipulation when concrete is not removed.

The Division was informed that the portal was sealed and backfilled. The blowing air may be caused by an opening in the seal and backfill. R645-301-551 requires all that all underground openings be properly sealed and backfilled. The blowing air suggests that the portal is not completely sealed.

The Operator has agreed to cover the portal opening with four feet of cover and determine if the portal was properly backfilled and sealed. Either four feet of cover will be placed

Page 2
ACT\007\004
Nov 14, 1994

over the concrete or the lining will be broken up and covered. The Operator will check his records to determine how the portal was sealed and backfilled. The Operator preference is to expose the portal lining and demolish it then place the fill over the rubble. During that process they will examine the backfill and determine if the portal needs to be resealed.

The Operator has the responsibility to determine if the seals are functioning. If they are not then he must submit a plan to MSHA and the Division to properly seal the portal. The sealing plan will be evaluated then.

Recommendation

1. Require the Operator to place four feet of cover over the portal lining.
2. Require the Operator to investigate the seal. If the seal is defective it must be repaired.

castleg.whw