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DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF OIL, GAS AND MINING

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TO: Daron Haddock, Permit Supervisor

FROM: Wayne H. Western, Reclamation Engineer *W#W*

RE: Reclamation Changes at Sowbelly Canyon, AMAX Coal Co., Castle Gate Mine, ACT/007/004, Folder #2, Carbon County, Utah

Synopsis of Proposal

AMAX proposes to construct an ancillary road during reclamation Phases II and III. The road known as A-2 would provide access to the entire site by maintenance vehicles. The gradient of the road was minimized by aligning the road with the reclamation contours to the extent possible and will vary from approximately 1% to 15%. The road surface will be graded, compacted native sandy gravel, except the portion of the road upstream of station 9+00 of reclamation channel SBRD-1D. That portion of the road will follow the alignment of the channel, and therefore the road surface will be riprap. Cut slopes and fill slopes will be kept to a minimum. Ancillary road A-2 will be scarified and seeded once vegetation is established and a consensus is reached concerning the fate of the reclamation ponds.

A-1 is an existing ancillary road that provides access to the substation facility. The road grade varies from 1% to 8%. Reclamation of road A-1 will commence in Phase IV of the reclamation.

In the backfilling and regrading plan the Operator has changed the reclamation plan. The proposed plan says that the highwalls by the NO. 5 fan portal and the one above the actual No. 5 mine entrance will both be eliminated *'to the extent possible'* by backfilling at a slope of *'approximately'* 2H:1V.

Analysis

The Operator did not state a reason why the phase *'to the extent possible'* should be added to the backfilling and grading plan. In addition there was no reason stated for inserting *'approximately'* when describing the reclaimed slopes final grade. If the

Operator needs to modify the backfilling and grading plans then a detail proposal should be submitted to the Division. The changes to the backfilling and grading plan should not be approved since the Operator failed to supply any reasons for the changes.

Ancillary road A-1 can remain until the Phase IV of the reclamation program. The road provides access to the substation.

Ancillary road A-2 provides access to the site that will be needed until the final stages of reclamation. The road meets all of the engineering requirements except for the timing of reclamation. The Operator states that road will be reclaimed once a consensus is reached regarding the fate of the ponds. The Operator needs to state specifically when reclamation will be completed.

Part of the road is located in a drainage. The hydrology regulations prohibit any road from being located in a drainage unless specifically approved by the Division. The Division has not approved the location of the road in a drainage. That determination should be made by the Division's hydrologists.

### Recommendations

1. Do not approve the changes to the backfilling and grading plan.
2. Allow the Operator to retain ancillary road A-1 until Phase VI.
3. Deny construction of road A-2. Before approval the Operator must include the road in the reclamation timetable.