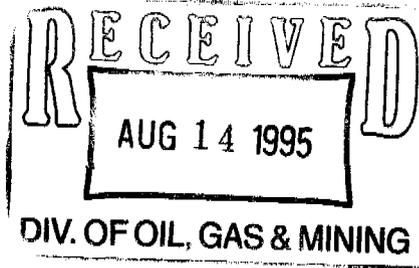


0016

007/004 # 2

August 11, 1995



**EarthFax**

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Mr. Daron R. Haddock  
Permit Supervisor  
Utah Division of Oil, Gas and Mining  
355 West North Temple  
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Salt Lake City, UT 84180-1203

**SUBJECT:** Phase I Bond Release Issues  
Sowbelly Canyon  
Castle Gate Mine, Carbon County, Utah.  
Permit ACT/007/004

Dear Daron:

On August 1, 1995, I attended a meeting with Mr. Steve Johnson (Division) and Mr. Johnny Pappas (Cyprus/Amax) at Sowbelly Canyon to discuss the continuing reclamation of the canyon. Additional work is scheduled for this fall, including backfilling a cutslope/highwall, burying refuse, and adding riprap to several reclamation channels. Reclamation improvements will include soil preparation and reseeding of all areas redisturbed by grading. Deep gouging and subsurface hay mulching will be specified, and apparently this combination has been found to be a very effective alternative sediment control measure. If the soil preparation and mulching are done properly, the existing sediment ponds would serve no useful purpose because of negligible sediment loss from the reclaimed surfaces. Consequently, Cyprus/Amax would like to accelerate the reclamation process and minimize future disturbance of the canyon by removing the sediment ponds this fall. This letter serves as a request for a minor permit amendment to follow this approach.

Cyprus proposes to implement the final reclamation topography plan, as shown on permit Exhibit 3.2-4, by filling in Ponds 016 and 017. The berm diversions directing precipitation runoff to the ponds will also be filled and regraded. The areas disturbed by regrading will be deep gouged using an excavator, and 2 tons/acre of hay mulch will be incorporated into the top 18 inches of the soil. Seeding will immediately follow, and straw mulch will be applied at the rate of 1 ton/acre. The straw will be lightly crimped in place using the teeth of an excavator bucket. Removal of the ponds negates the need for a maintenance road; and thus, temporary road A-2 will also be removed. Again, the redisturbed area will be gouged, mulched, and seeded.

A separate but related issue involves the as-built construction of reclamation channel SBRD-4. Apparently, the existence of refuse along the channel alignment discouraged the original reclamation contractor from further excavation. As a result, the profile of the channel is approximately 3 to 6 feet higher than the profile depicted by the approved reclamation topography plan (Exhibit 3.2-4). Our understanding is that the Division is not comfortable

007/004

Mr. Daron R. Haddock  
August 11, 1995  
Page 2

with this variance. In an effort to resolve this issue, Cyprus proposes to reconstruct channel SBRD-4, and regrade the adjacent area, as shown on Exhibit 3.2-4. If refuse is encountered during reconstruction, it will be placed in Pond 017 prior to backfilling the pond. A minimum of 4 feet of non-refuse soils will be placed over the refuse. The redisturbed area will be gouged, mulched, and seeded as discussed above.

Exhibit 3.2-5 has been revised to show that the entire area within the disturbed area boundary will utilize alternative sediment control measures to control erosion. The revised exhibit is enclosed.

Please review this amendment and advise us of your concerns. The reclamation contractor is scheduled to start placing fill against the highwall in early September. Your prompt response will permit Cyprus to utilize the same contractor to backfill the ponds.

Please call myself or Mr. Pappas if you have any questions.

Sincerely,



William S. Hendrickson, P.E.  
Civil Engineer

cc: Johnny Pappas (Cyprus)

Enclosures

007/004