

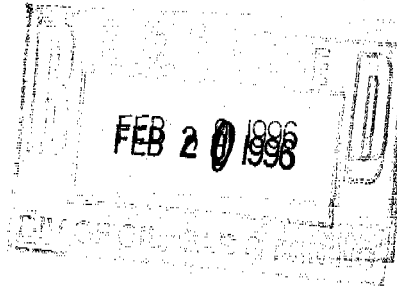
0050

February 20, 1996



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Salt Lake City, Utah 84180-1203



RE: Response to the Division's Draft Analysis and Findings for Crandall Canyon, AMAX Coal Company, January 9, 1996

*BCT/007/004*

Dear Mr. Haddock:

*#2*

Please find enclosed three copies of the response to the Draft Analysis and Findings (DAF) for Crandall Canyon, AMAX Coal Company that EarthFax Engineering, Inc. (EarthFax) has prepared at the request of Mr. Ben Grimes, Cyprus Plateau Mining Corporation. The following items are included as part of this response:

- Pages of Section 3.7 and Exhibits 3.7-7 A, 3.7-7B and 3.7-7C that have been modified in response to the DAF,
- Pages of Appendix 3.7S that have been modified in response to the DAF,
- Appendix 3.7U, "Post Reclamation Cutslope Justification", and
- Modifications to Chapter 3, Section 3.1, including the reclamation bond estimate for Crandall Canyon as an Addendum to Appendix 3-2.

The following is a brief description of the response or the changes made to Chapter 3, Section 3.7 text as a result of the DAF. Some of the descriptions are only references to pages where the changes to the text can be found. The descriptions are organized to follow the format of the summary within the DAF.

R645-301-200

1. Errors within the text of Appendix 3.7S have been corrected and individual pages with corrections are included. References to analytical methods used to determine specific parameters have been modified to reflect actual analyses methods used. Lab data sheets that include the information used to determine Acid/Base potential have been added to Appendix 3.7S in the analytical results appendix. Fertilizer recommendations have been modified in Section 3.7 to state that fertilizer requirements will again be evaluated after the pre-reclamation sampling is completed. The verb tense used within

the text to describe reclamation activities was determined not to be an issue with agreement by Mr. Robert Davidson, UDOGM. Table 3.7-10 was mistakenly referred to in the text as Table 3.1-10. The reference was changed. The references to Simon, Li, and Assoc. have been added to the list of references. The discussion about ripping P-1 was a misunderstanding by UDOGM and not an issue.

2. The vegetation issue regarding the soils of the upper and lower pad has been addressed on page 3.7-49 of the revised text.
3. The text on page 3.7-48 has been modified to state that the maximum allowable concentration of selenium within topsoil is 0.10.
4. The text on pages 3.7-33 and 3.7-50 has been modified to state that soil preparation will include loosening soils to 18-24 inches.

R645-301-340

1. The planting rate of ponderosa pine, Douglas fir, and juniper has been specified as 300 seedlings per acre. This text is found on page 3.7-52.
2. As described above, the response is found on 3.7-49 of the revised text.
3. References to leaving depressions within the reclaimed area have been removed from the text.

R645-301-500

1. The cutslopes to remain after reclamation have been identified and discussed on pages 3.7-35 and 3.7-36 and within a new appendix, Appendix 3.7U.
2. The text on pages 3.7-33 and 3.7-38 has been modified to state that the backfill slopes will have a minimum safety factor of at least 1.3.
3. See item 2 above.

R645-301-720

1. The exhibits were not changed. However, page 3.7-15 was modified to clarify the location of sampling point B-22.

R645-301-760

1. All provisions alluding to retaining the road after reclamation have been removed from the text of the MRP.

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R645-301-731.600

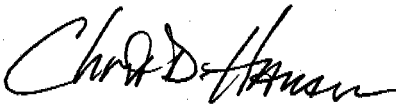
1. The issue of a stream buffer zone was addressed in the January 24, 1996 meeting with UDOGM and is already in the permit.

R645-301-542.620

1. Text and exhibits were modified to specify and illustrate that all culverts will be removed during final reclamation. Pages 3.7-39 and 3.7-42 have been modified to reflect removal of all structures. A misunderstanding regarding structures remaining after reclamation may have resulted when the stream appeared to follow the same pre-reclamation course and appearing to flow through culvert CCC-24. The culvert is actually illustrated on the exhibit with screened back lines and is only included to illustrate the location of an existing operational feature. The reclamation topography is shown in heavier line weights.

If you have any questions regarding this material, please call me at (801) 561-1555.

Sincerely,



Chris D. Hansen

enclosures

cc: Mr. Ben Grimes, Cyprus Plateau Mining Corp.