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March , 1996

TO: Daron Haddock

FROM: Michael Suflita, Reclamation Hydrologist

RE: Draft Review, Crandall Canyon, Castle Gate Mine, ACT/007/004
Working File, Carbon County, Utah.

Folder #2

SYNOPSIS

On January 10, 1996 DOGM sent an Analysis and Approval of the Crandall Canyon Reclamation Plan to AMAX Coal Company. On February 20, 1996 AMAX submitted their response. This Technical Analysis is in response to the Feb. 20th submittal. These comments are limited to the Hydrologic elements.

ENVIRONMENTAL RESOURCE INFORMATION

R645-301-720. Environmental Description.

Analysis

The revisions to page 3.7-15 make it sufficiently clear as to the location and correct reference for Spring Monitoring Station B-22.

Findings

The requirements of R645-301-722.300, to provide the "Elevations and locations of monitoring stations used to gather baseline data on water quality and quantity...." have been met.



R645-301-760, Reclamation

Analysis

The revisions to Page 3.7-31 have removed all references to retaining the main access road.

Findings

The requirements of R645-301-760 have been met. This includes especially " 762 Roads. A road not to be retained for use under an approved postmining land use will be reclaimed immediately after it is no longer needed for coal mining and reclamation operations, ...".

R645-301-731.600, Stream Buffer Zones

Analysis

As indicated in the February 20, 1996 letter to DOGM, the stream buffer zone issues were resolved in the January 24, 1996 meeting between AMAX Coal Co, and DOGM. They had been previously addressed in the original Technical Analysis, however, they were inadvertently raised again. Further, the Permittee has committed to erect Buffer Zone signs in Crandall Canyon as soon as the ground is no longer frozen.

Findings

The requirements of R645-301-731.600 have been met. Especially paragraph 620 which stipulates that, " The area not to be disturbed will be designated as a buffer zone, and the operator will mark it as specified in R645-301-521.260."

R645-301-760, Reclamation & -742.313, Diversion

Analysis

The plan has been revised to explicitly remove all culverts during reclamation. See pages 3.7-39 and -42.

Findings

The plan is now in conformance with the requirements of R645-301-760. Specifically, "761. General Requirements.the Operator will ensure that all temporary structures are removed and reclaimed..." . Further, the requirements of -742.313 are met where it is required that "Temporary diversions will be removed when no longer needed to achieve the purpose for which they were authorized."

Recommendations

Based on meeting the above Outstanding Deficiencies the Mine Reclamation Plan is approved.