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

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March 5, 1998

Chris Hansen
Canyon Fuel Company, LLC
P. O. Box 719
Helper, Utah 84526

Re: Requirement to Correct Plan Deficiencies Associated with Highwall Elimination, Canyon Fuel Company, LLC, Skyline Mine, ACT/007/005, Folder #3, Carbon County, Utah

Dear Mr. Hansen:

During the last two years one of the main topics of oversite has been Highwall Elimination and Retention as a Part of Approximate Original Contour Restoration. The joint DOGM/OSM oversite team has evaluated this element under the primary oversight objective of determining whether minesite reclamation is successful. Surveys were sent to the mine operators asking for information on highwalls, mine plans were reviewed, field visits were conducted and an inventory compiled which identified those mine sites that had permit deficiencies associated with highwall reclamation.

In the highwalls inventory, the team found that 7 of the 35 mines (20 percent) in Utah have permit deficiencies relating to highwall reclamation. These deficiencies include: (1) those situations where the permits show parts of post May 3, 1978, highwalls that will be retained contrary to the requirements of Utah's program, and (2) other situations where the permits are not clear as to what extent pre and post May 3, 1978, highwalls will be eliminated.

The Skyline Mine was one of those identified as having permit deficiencies. In order to resolve the deficiencies, you must revise your reclamation plan to address the elimination of highwalls as a function of Approximate Original Contour Restoration. It is suggested that you provide maps and cross sections of the highwall areas in enough detail to show how they will be reclaimed (cross sections perpendicular to the portal areas are recommended). The text also needs to discuss complete elimination for all post May 3, 1978 highwalls, and elimination, to the extent practical, using all reasonably available spoil for pre May 3, 1978 highwalls. Enclosed is a copy of the Division's Directive on Approximate Original Contour Requirements which may aid you in preparing your response.

We have attempted to tie the schedule for correcting your plan to some other major permitting action that may be happening at the mine as well as trying to space out the reviews to accommodate DOGM's time frames. The schedule for the Skyline Mine was discussed with you and it was determined to correct the plan in conjunction with the Mid Term Review which is October 30, 1999.

Please provide the required amendment by no later than the mid term date. We recognize that this is over a year away, but encourage you to start correcting the problem now so that you will have any necessary field work done and adequate information compiled by the time your mid term is due. If you have any questions, don't hesitate to call. We look forward to hearing from you.

Sincerely,

Daron R. Haddock

Daron R. Haddock
Permit Supervisor

jb
Enclosure: Division's Directive on ... Contour Requirements
cc: Jim Fulton, OSM, w/o
Mary Ann Wright, DOGM, w/o
Joe Helfrich, DOGM, w/o
Price Field Office, w/o
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