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ACT/007/006



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July 16, 1980

Mr. Mark Adkins
Geologist and Property Aquisition
UNC Plateau Mining
P.O. Drawer PMC
Price, Utah 84501

RE: Starpoint Refuse Pile Extension
MSHA ID No. 1211-UT-9-0008
Star Point No. 1 & No. 2 Mines
ACT/007/006

Dear Mr. Adkins:

The Division of Oil, Gas, and Mining has received submittals for the extension of refuse pile ID No. 1211-UT-9-0008. Representatives of the Division identify the following documents as the submittal to date:

- (1) A submittal containing methods for calculating peak discharge for the permanent diversion designs, including a letter from Mr. John Barton, MSHA, here-in-after "the original submittal".
- (2) A submittal entitled the Proposed Refuse Pile Extension Addendum, here-in-after "the Addendum".
- (3) The Underground Mining Permit Application submitted March 1, 1980, here-in-after "the Permit Application".

A review of these documents submitted by UNC Plateau Mining was conducted by the Division for completeness with regard to approval of the refuse pile extension. Utah's regulations, the Coal Mining and Reclamation Permanent Program, Chapter I permit the disposal of non-acid and non-toxic forming coal processing waste as part of a head-of-hollow fill as containing coal processing waste. Plateau should be cognizant that the Office of Surface Mining (OSM) is in the process of reviewing Utah's Permanent Program. As of this date, OSM has requested the Division to incorporate the design criteria contained in the Permanent Program: UMC 817.81, 817.82, 817.83, 817.85, 817.86, 817.91, 817.92 and 817.93 into UMC 817.71, 817.72 and 817.73, which discuss head-of-hollow fills.

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In order for Plateau to receive timely approval for the extension of the refuse pile, the Division may approve a plan for the extension of the pile prior to the approval of the Permit Application if the plan is complete with respect to the following:

- (1) A detailed plan which demonstrates that the refuse pile extension will be constructed, operated and maintained in compliance with design criteria and performance standards of the Permanent Program.
- (2) The area which will be disturbed or directly affected by the extension is addressed pursuant to the resource information contained within the Permanent Program, UMC 783.
- (3) A reclamation plan for the area of the extension, including final grading, soil distribution, revegetation, determining revegetation success, final surface and underground water course configuration, abandonment procedures, and costs of reclamation, etc., UMC 784.

The Division must insure that the proposed extension of the refuse pile will comply with the requirements of the Permanent Program. Comments generated by the Division follow:

General Comments

- (1) The Division recommends that Plateau organize the information contained in the original submittal, the Addendum, the specific information needed from the Permit Application, and any new information into a single document which is pertinent to the refuse pile extension. This organization would include the operation and reclamation plans integrated with environmental protection.
- (2) Plateau needs to describe in the operation plan for the refuse extension, the projected amount of refuse, the projected extent of the pile on a per year basis for a permit term, as well as the life of the pile.
- (3) The reclamation plan should also be supplemented to include justifications for any modifications to reestablishing the land surface to a configuration similar to the original contours and justifications for the longterm functioning and stability of embankments or diversions not removed upon abandonment.
- (4) All maps and plans for engineered structures, fills, or embankments shall be prepared under the direction and certified by a qualified professional engineer registered in the State of Utah. All plans must be prepared and submitted under the direction of a responsible company official. All maps should include the information in the pertinent regulations, UMC 783.24 and 784.23 etc. All preexisting structures including the existing refuse pile should be labeled on all maps.
- (5) Plateau must demonstrate to the Division by taking random samples from the existing coal processing waste and information from exploration drilling, that the projected coal processing waste for Plateau's operation (not Price River Coal) is non-acid and non-toxic forming.

Comments on Soils

- (1) A detailed discussion of soils for the area to be disturbed by the extension of the refuse pile must be submitted per the requirements of UMC 783.21. The soil survey information shall be obtained in accordance with the standards of the National Cooperative Soil Survey and in accordance with the procedures set forth in the U.S. Department of Agriculture Handbooks 436 and 18. The requirements for format and content are found in the Permanent Program regulations UMC 771.23.
- (2) The results of chemical and physical analyses of the soils to be disturbed must be submitted in accordance with the Permanent Program regulations UMC 817.22.
- (3) The areal extent, depth, and volume of soil material to be removed must be included, as well as the methods and procedures for removal, storage, and redistribution as required under the Permanent Program regulations UMC 817.22, 817.23, and 817.24.

Comments of Vegetation and Revegetation

- (1) A detailed discussion of vegetation cover and productivity for the area to be disturbed by the extension of the refuse pile must be submitted. The discussion should include: methods and procedures, description of vegetation, possible threatened and endangered species of plants, interpretations and impacts, etc. Please refer to the enclosed vegetation guidelines.
- (2) As part of the reclamation plan, the revegetation plans should describe methods, including: seed bed preparation, fertilizing, seeding (include mixtures), mulching, and management. The standards for revegetation success, including the reference area and vegetation monitoring plan should be described. The schedule and cost of revegetation should be included with other reclamation costs.

Comments on Wildlife

- (1) Plateau should specifically address the use by wildlife in the area to be disturbed by the extension of the refuse pile.
- (2) The fish and wildlife plan should specifically address how revegetation will restore the area for use as wintering range for mule deer.

Comments on Hydrology

- (1) Plateau must demonstrate in detail that the East Sediment Pond depicted on Map 2 of 4 of the original submittal has a capability to handle the 10 year - 24 hour peak flow event plus sediment storage volume, see enclosed calculations.
- (2) Plateau must demonstrate in detail that the diversion channel has the capability to handle a 100 year - 24 hour peak flow event.
- (3) Plateau must demonstrate that the peak flow from the 10 year - 24 hour event will have a velocity of less than 5 feet per second in the disturbed area collection ditch.

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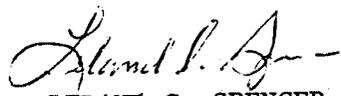
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Comments on Stability

- (1) Plateau must update and incorporate the Dames and Moore recommendations. The refuse pile extension must be constructed such that the stability will be demonstrated to have a long term safety factor of 1.5 by a qualified professional engineer registered in the State of Utah. Information from the piezometers placed in the existing refuse pile as discussed in the Dames and Moore report should be presented as well as any plans for installation of additional piezometers.
- (2) Plateau must include a detailed discussion of construction methods, including removal of brush and soils, installation of underdrains for drainages, seeps and springs, suitability of construction materials, methods of compaction and other information which demonstrates that the refuse pile extension will comply with regulations contained in the Permanent Program, UMC 817.71, 817.72, 817.73, 817.81, 817.82, 817.83, 817.85, 817.86, 817.91, 817.92, and 817.93.
- (3) Plateau must demonstrate that the refuse pile extension, as well as the existing refuse pile, is designed, will be operated, will be maintained, and will be abandoned with methods which will minimize the potential for spontaneous combustion pursuant to regulations of the Permanent Program, UMC 817.81 (a)(1).
- (4) Detailed plans for underdrains need to demonstrate that the refuse pile extension will comply with requirements of the Permanent Program, UMC 817.83.
- (5) The construction and operation plans for the refuse pile extension must adopt the inspection requirements of a registered professional engineer in accordance with requirements of the Permanent Program, UMC 817.82.

Please review the previous submittals and submit the above information at the earliest opportunity. It would be helpful for reviewing purposes if Plateau would consolidate the information for the refuse pile extension into a single complete document. Please feel free to call the Division for clarification or further assistance.

Yours truly,


LELAND C. SPENCER
RECLAMATION ENGINEER

LCS/kmf

cc. Don Crane, OSM
Mike Dmitrich, UNC Plateau Mining

Enclosures (2)
Calculation Sheet
Vegetation Guidelines