

February 22, 1982

Inspection Memo
to Coal File:

RE: Bishopsgate Coal Corporation
Scofield Area
Coal Exploration Drill Sites
#81-5-2, #81-5-1B, #81-8-2
and #81-5-1P
CEP/007/006
Carbon County, Utah

On November 13, 1981, Division Inspectors Sandy Pruitt and David Lof visited the above-mentioned drill sites to determine their status and the status of NOV N81-4-5-2 which was supposed to have been terminated no later than November 12, 1981.

Drill hole #81-5-2 is located on the south side of Winter Quarters Canyon access road. Notice of Violation N81-4-5-2, #2 of 2, was written for the operator's failure to return to the approximate original contour the mud pits and associated fill materials created during exploration activities promptly after these features were no longer needed for the coal exploration. Bishopsgate was to have pumped fluids out of the pits, disposed of the fluids properly, and then backfilled and recontoured the mud pits to their approximate original contour. At the time of the inspection, the remedial actions had not been completed. The fence which had previously surrounded the drill site had been removed and it appeared as though some attempt had been made at pumping the fluids out of the pit. However, no other work had been done.

Drill hole #81-5-1B is located on the north side of Winter Quarters Canyon access road. Notice of Violation N81-4-5-2, #1 of 2 was written for failure to prevent erosion and additional contributions of suspended solids to streamflow or runoff outside the exploration area. The remedial action required the implementation of drainage control measures to divert undisturbed area runoff away from the exploration site, and some means of containing and treating disturbed area runoff prior to leaving the exploration area. At the time of the inspection, the remedial action had not been completed. In fact, the only work which had been done was the consolidating of the two mud pits into one pit.

On November 25, 1981, Division Inspector David Lof phoned Mr. Scott Williams of POMCO to inquire as to why the remedial actions required for the abatement of NOV N81-4-5-2 had not been completed. He explained that he had been informed by his field personnel that the work had been completed. Due to the evident miscommunication as to what the remedial actions did in fact require, an on-site meeting was arranged for November 30, 1981.

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Division Inspector David Lof met with Mr. Tom Stover of POMCO on November 30, 1981, in Winter Quarters Canyon. The two drill sites (81-5-2 and 81-5-1B) were still in the same condition they were on November 13. Mr. Lof pointed out the deficiencies at the sites and explained what the remedial actions required. Due to the fact that the ground at the drill sites was now frozen and there was approximately 12 inches of snow on the ground making it impossible to meet the original abatement requirements at this late date, the violations were modified as follows:

Remedial Action:

Fence off the disturbed area and install straw bales around the entire perimeter of the disturbed area (within the fence) using roof bolts or a similar material to stake the bales in place. These measures must be maintained until that time at which the remedial action required in the original NOV N81-4-5-2 may be properly implemented without further disturbance or damage to the exploration area (i.e., overcompaction of the soils by the regrading equipment due to the soil high water content) and the areas immediately adjacent.

Drill hole #81-8-2 is located in the NW1/4 of the NW1/4, Section 8, Township 13 South, Range 7 East. The drill site was approximately 100 feet X 150 feet, it was fairly level and it was located in an ephemeral drainage. No drainage control measures had been implemented at the site in order to control runoff from the area or divert drainage around the disturbed area. The mud pits were still intact, there appeared to have been bentonite and cement spilled near the mud pits. It also appeared that no attempt had been made at reclaiming the drill site.

During the November 25 telephone conversation with Mr. Williams, Division inspectors were informed that the surface landowner had requested that the exploration site be left in its present condition to facilitate future planned land-use. Division inspectors informed Mr. Williams, that even though the surface landowner had requested that the exploration site be left in its present condition, that Bishopsgate was still responsible for runoff control at the exploration site and its eventual recontouring and revegetation, unless the surface landowner provided the Division with a written request that the exploration site be left in its present condition. Due to the above-mentioned facts, NOV N81-4-6-1 was written and issued to Mr. Stover on November 30, 1981; it reads as follows:

Nature of the Violation:

Failure to prevent erosion and additional contributions of suspended solids to streamflow or runoff outside the exploration area.

Provisions of the Regulations Violated:

UMC 817.15(c)(3)

UMC 815.15(g)

UMC 815.15(j)

Portion of the Operation to Which Notice Applies:

Drill hole #81-8-2.

Remedial Action Required:

1. Install straw bales around the perimeter of the disturbed area using roof bolts or similar materials to stake the bales in place.
- 2A. Maintain the measures required in part 1 until that time at which the site may be recontoured and revegetated in accordance with the approved general exploration plan and UMC 815.15; or
- 2B. Provide the Division with a written request from the surface landowner to leave the exploration site in its present condition to facilitate future planned land-use.

Time for Abatement:

1. December 5, 1981.
2. December 30, 1981.

Drill hole #81-5-1P is located in the NW1/4 of the NW1/4 of Section 5, Township 12 South, Range 7 East. The approximate size of the drill site was 50 feet X 100 feet and required the development of approximately 1,000 feet of new access road from an existing road. The drill site was still in the process of being developed. Some topsoil had been removed and stockpiled. The pad for the water truck and drill rig had been developed. The mud pits were being excavated and the drainage control had yet to be implemented. During the November 25, 1981, phone conversation with Mr. Williams, he was informed that the drainage controls still needed to be implemented and that the topsoil needed to be protected prior to initiation of drilling.

DAVID LOF
RECLAMATION OFFICER

cc: Tom Emmett, OSM

DL/btb

Statistics:

See Emery Deep Mine memo dated November 23, 1981
Grant: A & E