

0048

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RESPONSE TO DOGM AREAS OF CONCERN.

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RESPONSE TO DOGM AREAS OF CONCERN
CORNER CANYON VENTILATION FACILITY

UMC 784.11 OPERATION PLAN: GENERAL REQUIREMENTS

After submittal of the supplemental permit on March 30th, No.4 entry was broken to the outside. The breakout location is twenty feet south-east of the location shown on Exhibit 6 in line with the mine tunnel. The result of the new breakout location is that the deck surface must be ten feet higher in elevation. This situation necessitates a slope between No. 4 breakout and No. 2 breakout of 13 percent; the design engineers felt that rather than using a fill, as planned previously, that a cut slope would eliminate any question of stability and would be simpler to reclaim. Therefore, we propose to change the plan. The new plan is shown on Exhibit 6 Revision 1, with detail revisions shown on Exhibits 7, 8 and 9 attached.

The construction methods will be the same as previously submitted. This change in effect just shifts the location of the major part of the cut twenty feet east and ten feet higher in elevation.

After careful considerations, we believe the best alternative for topsoil storage is to transport the topsoil through the mine, and store it near one of our existing topsoil stockpiles. Refer to Exhibit 11 for stockpile location. Topsoil will be discussed at greater length in sections UMC 817.22, 817.23, 817.24 and 817.25 to follow.

With the topsoil pile removed from the plan, the total disturbed acreage is 0.30 acres as compared to the previous 0.31 acres. The hydrology calculations have been revised to reflect the reduction of disturbance by 0.01 acres, refer to Attachment D, Revision 1 attached.

UMC 784.13 RECLAMATION PLAN: GENERAL REQUIREMENTS

(b) (5) (c) Amend the seed list to the following:

Phleum prense ^{Alpinum} , Alpine Timothy -	.5 lb. PLS *
Aster chilensis, Aster	.1 lb. PLS
Poa pratensis, Kentucky Bluegrass	.5 lb. PLS
Medicago sativa, Ranger Alfalfa	1.25 lb. PLS
Bromus marginatus, Mountain Brome	3.25 lb. PLS
Agropyron tachycaulum, Slender Wheatgrass	2.4 lb. PLS
Lupinus alpestris, Lupine	.5 lb. PLS
Vicia americana, American Vetch	.5 lb. PLS
Geranium viscosissimum, Geranium	.5 lb. PLS
Osmorhiza occidentalis, Sweet Anise	.5 lb. PLS

* Pure Live Seed

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DIVISION OF
OIL, GAS & MINING

Delete wild strawberry from the list, the remaining species provide a diverse mixture.

UMC 817.11 SIGNS AND MARKERS

Perimeter markers shall be constructed of metal and shall have the following printed on them:

PLATEAU MINING COMPANY
ACT 007/006
637-2875
OPERATIONS AREA

Buffer zone marker signs shall be constructed of metal and will be placed at each breakout, and will be marked:

INTERMITTENT STREAM BUFFER ZONE

Topsoil signs shall be constructed of metal, and shall have the following printed on them:

TOPSOIL - CORNER CANYON FAN - USE ONLY AT CORNER CANYON

UMC 817.22 TOPSOIL: REMOVAL

We will make every reasonable effort to segregate topsoil from subsoil, taking into consideration the steepness of the slope and human safety.

The drill hole showed ten inches of topsoil; No. 2 breakout shows eight inches; No. 1 breakout shows four inches. Three exposed areas within a 0.3 acre tract are enough to adequately predict topsoil volumes.

If the Division prefers, we could average the three topsoil depths which would be 7.3 inches = 304 cubic yards; or, we could say the topsoil is 10 inches = 403 cubic yards.

We feel that quibbling over a matter of a few tenths of an inch of topsoil is ludicrous when we have committed to making every reasonable attempt to retrieve as much as humanly and mechanically possible.

UMC 817.23 TOPSOIL: STORAGE

Subsoil will be stored underground in secured areas. Stability of the mine in this area will be good based on many other locations very similar to it throughout our mines. Overburden depths are small (500-700 feet) which rarely cause any stability problems. Since this area is to be utilized for ventilation for the life of the mine, no pillar extraction or caving will be conducted anywhere near it. Refer to Exhibit 10 for storage location. Volume of subsoil to be excavated is 5,000 cubic yards using a 30% swell factor.

The topsoil stockpile will be separated from the existing topsoil pile and clearly marked with signs as previously discussed. Runoff will be controlled by perimeter ditches. Temporary topsoil protection will be provided by using straw mulch covered by nylon netting stapled into the topsoil. When seeding is to be done in the fall of this year, the netting and straw will be removed. After seeding, the straw and netting will be replaced.

The topsoil removed from Corner Canyon will be returned to Corner Canyon.

UMC 817.24 TOPSOIL: REDISTRIBUTION

The map showing topsoil depths and locations will be submitted to the Division as soon as it is available.

Subsoil will be placed directly on the pad surface which will be a bench that will be stable. During placement of the subsoil, it will be compacted with the crawler that will be utilized for backfilling. The surface of the subsoil will be scarified to form a rough bed for the topsoil. The scarified subsoil will also promote root penetration. The slope of the surface is shallow enough that no surface stability problems are anticipated.

(b) (3)

It would be logical to expect that redistribution of topsoil will be accomplished immediately after backfilling the cut in the summer or fall. Since no other access to the site will be available for machinery after leaving the area, topsoil redistribution will have to be placed as explained in the supplement previously submitted.

Temporary protection of the redistributed topsoil will be accomplished by using straw mulch held in place by nylon netting until seeding. The netting and straw will be removed to seed and then replaced.

UMC 817.25 TOPSOIL: NUTRIENTS AND SOIL AMENDMENTS

"Micronutrients" as shown in the supplement is a typo; it should read "Macronutrients".

Available nitrate NO₃, will be tested for by the Standard Methods 418F procedure, or the method approved by the Division at the time of analysis.

Total nitrogen N will be tested for by the Standard Methods 417F procedure, or the method approved by the Division at the time of analysis.

Amend all statements such as "may be determined" to shall be done in accordance with DOGM guidelines in effect at the time of analysis.

The topsoil stockpile will be sampled by using an auger. Samples will be extracted at the surface and at depths of two feet and four feet. The samples will be combined to form a composite sample.

Composite samples are justified because the topsoil will be mixed during the process of picking it up, transporting it, and redistributing it.

UMC 817.42 WATER QUALITY STANDARDS

(a) (3)

1. The South Fork of Corner Canyon is an intermittant stream.

We will increase the size of the basin to a minimum of 1,450 cubic feet to contain sediment and runoff.

A depth marker will be installed in the basin, and we will clean out the accumulated sediment when it reaches the 1½ year sediment volume.

The basin will be lined with a two-ply hypalon, 30 mil, reinforced w/one-ply nylon scrim - pond liner or approved equal.

Straw bales will not be used in the overflow spillway.

UMC 817.43 HYDROLOGIC BALANCE: DIVERSIONS

(f) (1)

Refer to Exhibit No. 6 for riprap sizes and locations. Refer to Attachment D figure 3 for riprap size calculations.

As can be seen in Attachment D, sheets 5, 6, 7, and 8, the assumption was that the total area drains into any one of the ditches D1, D2, or D3. The ditch as shown on sheet 7 of 12, is adequate to handle a ten year, 24-hour precipitation event as per UMC 817.43 (b). This design will be used for all ditches as shown on sheets 5 and 8 of 12, and is conservative because the runoff will be split between ditches D1, D2, and D3 as can be seen on Exhibit 6.

2. The ditch below the spillway will be the same design as used for ditches D1, D2, and D3, as shown on Attachment D sheet 7 of 12. This design as mentioned previously is adequate to handle a ten year, 24-hour event from the entire drainage area (15.5 acres); it should be adequate to handle the deck which is 0.30 acres. Refer to Attachment D Figure 3 for riprap size calculations, and Exhibit 6 for size and location of riprap.
3. As can be seen in Attachment D sheet 5 of 12, the entire drainage area peak discharge is 2.08 cfs. As can be seen on sheet 9 of 12, the culvert was designed using a discharge of 3.5 cfs; which requires a culvert size of 18 inches; water depth will be 9½ inches in the culvert at maximum discharge.

The new plan does not require a drop inlet. Details of the culvert can be found on Attachment D Exhibit 8.

The drainage area is shown in Attachment D on the last page.

UMC 817.89 DISPOSAL OF NONCOAL WASTES

In no case will contaminated drainage from the containment structure be passed through the sediment basin. Spillage in the containment structure will be pumped into a portable vessel and hauled through the mine for proper disposal.

UMC 817.12 REVEGETATION: INTRODUCED SPECIES

We are glad to see the Division and the Forest Service come to a quick consensus on a seed mix. The seed mix will be adjusted and will be as follows:

Bromus marginatus, Mountain Brome -	3	lbs. PLS	*
Agropyron trachycaulum, Slender Wheatgrass -	3	lbs. PLS	
Phleum pratense ^{Alpinum} , Alpine Timothy -	0.5	lbs. PLS	
Poa pratensis, Kentucky Bluegrass -	1	lbs. PLS	
Medicago sativa, Ranger Alfalfa -	1	lbs. PLS	

* Pure Live Seed

UMC 817.117 TREE AND SHRUB STOCKING

(c)(2) The plant numbers will be adjusted as follows:

337 Trees species:

169 ea. - Populus tremuloides, Quaking Aspen
168 ea. - Pseudotsuga mezesii, Douglas Fir

282 Shrub species:

141 ea. - Sambucus racemosa, Elderberry
141 ea. - Symphoricarpos albus, Snowberry