

January 31, 1985

TO: Coal File

FROM: Ken Wyatt, Mined Land Reclamation Specialist *KW*

RE: Plateau Mining Company (PMC) letter dated January 23, 1985,  
ACT/007/006, Folder #7, Carbon County, Utah

As per request from Mining Field Specialist, Bart Kale, this memo shall serve for formalize my response to statements made by PMC concerning my inspections at the PMC facilities on September 9, 1982 and October 20, 1982. My responses are made after checking my field notes, the inspection reports and comparing them with the allegations described on Page 2 of PMC's January 23, 1985 letter.

As described in the September 9, 1982 inspection report dated November 2, 1982, mention was made to the fact that "the valley fill subsoil stockpile has been completed." However, should the reader continue reading this section, he/she would find: "Drainage in the area was evidenced by water in the catch basin below the stockpile and by slight erosion in the drainage along the northern edge of this stockpile.

Hydromulching occurred on September 8, 1982 over this area. The stockpile should be examined on subsequent inspections to check on the stability and revegetation."

During the inspection, the operator, Mel Coonrod, indicated the stockpiling work as complete as seen by the hydromulched surface. Indicating the stockpile complete only means that the soil moving and stockpiling work was finished according to the operator, and does not preclude future problems in the area.

As stated in PMC's January 23, 1985 letter mention was made in Section 817.81 - .93 that the refuse disposal area extension has been completed. Again, completion of work does not indicate that all work is adequate and that future inspections will not reveal other problems. The fact that a trench was dug on June 27, 1984 to examine the remaining soil profile indicated that additional soil material may be available and should be salvaged should a soil deficient exist on the PMC facilities.

In reference to the October 20, 1982 inspection report dated November 9, 1982. It should be pointed out as mentioned in the inspection report: "No one from PMC was available to accompany

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this inspector. Many times during inspections no company representative is available and depending on schedule and time constraints, it is not possible to leave and return when a representative becomes available.

As is the case here, time constraints necessitated that I conduct my inspection without a company representative. No activity was observed in the refuse extension area, hence, the area was deemed completed. Again complete does not constitute adequacy especially since the focus of this partial inspection was on drainage control and design around the #1 mine access road. Again, the trench to examine the soil profile was dug at which time the determination to salvage additional soil material would be made.

wj

cc: Joe Helfrich, DOGM  
Bart Kale, DOGM  
0553Q-36-37