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ACT/007/006 #4

1985

STATE OF UTAH
NATURAL RESOURCES
Oil, Gas & Mining

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February 15, 1985

CERTIFIED RETURN RECEIPT REQUESTED
P396-996-945

Mr. Ben A. Grimes
Plateau Mining Company
P. O. Drawer PMC
Price, Utah 84501

Dear Mr. Grimes:

Re: NOV N84-6-15-1, Soil Salvage in Refuse Expansion Area, Plateau Mining Company, ACT/007/006, Folder No. 3 and 4, Carbon County, Utah

Information provided by PMC in letters of November 8, 1984 and January 23, 1985 together constitute the materials required by the Division letter of November 2, 1984.

1. It should be pointed out that stipulation 9-23-3 and special stipulation #6 are tied together. Further, the topsoil balance of the entire operation is the subject of 9-22-3 (not limited to to the refuse expansion area). This has not been addressed by PMC in the November 8, 1984 letter. In the November 8 letter PMC demonstrates that a surplus exists for the refuse expansion area only. PMC in past responses (February 17, 1982) to special stipulation #6 has indicated that a topsoil depth study and technology advances will yield a specific topsoil replacement depth for each portion of the operation. PMC states that test plot data will be applicable to other portion of the mine in an August 18, 1982 response. Stipulation 9-23-3 states that the need for substitute topsoil materials to make up the redistribution deficits should be evaluated. Thus the potential soil deficit an attendant need for substitute topsoil is a problem for the entire operation. This must be addressed to the fullest extent possible.

2. The available volume and need for this material must be evaluated in light of the overall soil balance for the entire minosle area by area. (Acreage to be reclaimed X inches of soil [by specific area] = amount required the amount in storage. Then determine the magnitude of the surplus or deficit). The cost: benefit ratio of obtaining soils in this area should be determined to the extent that the cost of removal is weighed versus the apparent need for the material.

With regard specific PMC comments on the apparent suitability of the material for salvage:

1. PMC in a previous submission states that the PL5 is very deep and well drained and that it occurs on alluvial valleys and fans. Further, the substratum is a loam of clay loam to a depth of 60 inches of more.

2. PMC in its letter of January 23, 1985 states that test plots indicate that "the material is supporting vegetation." This is material below the B_2. This indication of success by PMC lends further credence to the viability of the material in question. Indeed, PMC in its response to special stipulation #6 of August 18, 1982 makes a case for the positive capabilitis of mancos and sandstone to facilitate plant growth.

3. The inspector on site had questions regarding the viability of the material in question. For this reason a inspection with the Division Soils Specialist was arranged. Subsequently a tench was dug to afford a better look at the material.

4. My observation of the trench and materials nearby made on October 19 1984 indicate that it was a loose material of a loamy or clay loam texture. It appeared to be useable based on physical properties.

With regard to the various comments of PMC on the permitting process and its implementations:

The permitting process evolved based on special stipulation #6 and stipulation 9-23-3. A very detailed body of information was submitted and used in planning for soil removal. A soils supervisor was present during soil removal activities. PMC behaved in good faith and apparently exercised sufficient diligence throughout the process.

However, given the realities of handling hundreds of thousands yards of material on 152 acres the potential for errors in excecution certainly exists If this were the case it would hardly be considered anyones fault. It would simply need to be fixed.

The fact that an inspector made a statement that the activities associated with the refuse expansion soils handling operation were complete is not the same as a soils expert saying that they were completed to his satisfaction.

In short, PMC must provide the information requested under item 2 of the November 2, 1984 letter for the entire operation. Using this information in conjunction with other considerations a decision on the necesity of substitute soils removal will be made.

PMC must submit such information by March 11, 1985. In the meantime the protection of such material with strawbales must be maintained.

The Division will make a decision on the fate of such materials by April 1, 1985.

Sould you have any questions please call.

Sincerely,

Thomas L. Portle
Reclamation Soils Specialist

jvb
cc: D. Nielson
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