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STATE OF UTAH
NATURAL RESOURCES
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August 3, 1984

Mr. Steve Manger
Western Technical Center
Office of Surface Mining
Brooks Towers
1020 Fifteenth Street
Denver, Colorado 80202Dear Mr. *Steve* Manger:

RE: Additional Information Concerning Division of Oil, Gas and Mining Letter of July 18, 1984, "Operation and Maintenance Plan Approval for Manshaft Area", Kaiser Steel Corporation, Sunnyside Mine, ACT/007/007, #2, Carbon County, Utah

This letter is to clarify certain issues found in the Division's July 18, 1984 letter to the Office of Surface Mining (OSM). The following areas of the Company's activity were addressed in that letter: Manshaft Sediment Pond; Grassy Trail Creek Crossing; and, Twin Shafts Minewater Discharge Pond.

Manshaft Sediment Pond

After the meeting held at the Division on July 25, 1984 with Walt Swain and Steve Manger of the OSM, Western Technical Center, Division representatives believed certain issues still needed to be clarified in regards to the Grassy Trail Stream Crossing and the Twin Shafts Discharge Pond. It was thought that OSM's concern over the Manshaft Sediment Pond had been adequately addressed in the July 18, 1984 letter, thus no further information is provided herein relative to this pond.

Grassy Trail Creek Crossing

The Grassy Trail Creek Crossing is approximately 300 feet downstream from the Manshaft Sediment Pond and is found in the NW1/4 of the NW1/4 of Section 20, Township 14 South, Range 14 East. The Grassy Trail Stream Crossing is not considered a transportation facility, but is a reconstructed stream crossing associated with the maintenance and operation of the Manshaft Sediment Pond. A previous creek crossing, a ford, was washed out in the floods of 1983 and the current crossing was constructed to replace this crossing. The plans were reviewed by the Division and found to be technically

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adequate to address the permanent program regulations. The area chosen to relocate the crossing was the most environmentally acceptable area due to absence of steep creek banks and its close resemblance to a natural ford. This crossing will be used to aid in the operator's maintenance of the Manshaft Sediment Pond.

Twin Shafts Mine Water Discharge Pond

The Twin Shafts Minewater Discharge Pond is located directly adjacent to the Manshaft Sediment Pond across Grassy Trail Creek in a northeasterly direction. It is located in the NW1/4 of the NW1/4 of Section 20, Township 14 South, Range 14 East. The minewater pond is not considered a revision to the mine plan because of the reasons set forth in the July 18, 1984 letter and the following additional items.

In following the natural progression through UMC 788.12(a)(1), the subsections (i) and (ii) clearly do not cause this action to be classed as a revision. This leaves subsection (iii) to interpret. The "additional area" criteria does not apply to the Twin Shafts Minewater Discharge Pond because the pond is located on ground which has been previously disturbed and is not considered unique in terms of surrounding vegetation, soils, etc.

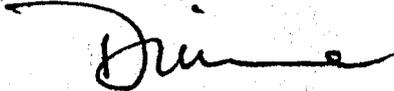
The minewater pond will be an incised pond, not requiring Mine Safety and Health Administration (MSHA) approval. It will enhance the underground pumping system, as well as define a particular point source discharge. It is important to note that this structure is bonded as disturbed area in the applicant's current reclamation bond. Overall, this structure will fulfill the operational need to meet the requirement of the permanent program regulations and improve compliance.

The sediment pond, the creek and the minewater pond have all been undermined in this vicinity with approximately 1,200 feet of overburden between the structures and the mine workings. Much of the undermining of this area and other areas of Grassy Trail Creek occurred in the 1940's and there have been no known problems associated with this undermining to date.

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The Division hopes this supplies the additional information needed to answer questions raised during the July 25, 1984 meeting. Please feel free to contact the Division regarding this matter. Your comments and concurrence to approve this operations and maintenance plan by August 13, 1984 will be appreciated.

Best Regards,



Dianne R. Nielson
Director

DRN/TM:btb
cc: Allen Klein, OSM
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