

October 26, 1982

Inspection Memo
to Coal File:

RE: Exploration Sites B-1 and B-2
Blazon Company
CEP/007/009
Carbon County, Utah

Doug Maier, Reclamation Geologist, and Sandy Pruitt, Field Specialist for the Division, inspected Blazon Company's exploration sites B-1 and B-2 on October 21, 1982. The purpose of the inspection was to determine if the company had taken any measures to comply with the approved Notice of Intent since receiving notification of a noncompliance situation on September 22, 1982.

The sites were accessed along a dirt road heading east from the base of the access to the Clear Creek strip pit. The road was heavily rutted but clear of snow and ice with the exception of some shaded sections (which presented no access problems). A chain across the upper road to the drill sites required that inspectors walk to the site along a passable road. There was evidence of recent vehicular access along the entire route to the drill sites.

Aside from locating the drill sites next to pre-existing roads, both drill site, B-1 and B-2, were developed with little or no regard to the specifications in the Notice of Intent. In particular, the adequacy of topsoil salvage and protection was questionable. There were no berms and ditches constructed around the drill site to control surface drainage as specified in the Notice. Abandonment procedures specified in the Notice of Intent were also disregarded. The drill holes were left unplugged, the mud pits were not backfilled, nor had any other recontour work been initiated. This work was to have been initiated promptly upon completion of drilling operation.

Since drilling operations are completed and no reclamation work initiated, Blazon Company was cited in violation of the coal exploration performance standards. At the time of the citation (one month following notification of noncompliance), there was no request by the company or landowner that reclamation be postponed or carried out in a manner contrary to the Notice of Intent. NOV #1 of 2 (N82-2-8-2) was issued for the failure to recontour excavations and embankments created during exploration to the approximate original contour promptly after exploration activities were completed. Remedial action required that the drill sites be fully reclaimed in accordance with the Notice of Intent approved November 30, 1981 or that an application for variance to reclamation requirements (based on the surface landowners request) be submitted. The time for abatement given is 30 days or no later than November 27, 1982.

MEMO TO FILE
CEP/007/009
October 26, 1982
Page 2

As a drilling rig is required for plugging a hole within and above the deep coal seam and the drill rig had left the site, the company should have at least requested DOGM approval for a variance from the plugging program committed to. NOV #2 of 2 (N82-2-8-2) was issued for the failure to permanently close drill holes. Remedial action required that the drill holes be permanently sealed as specified in the Notice of Intent approved November 30, 1981. In a registered letter accompanying the violations, it was requested that a Division member be present at the time for plugging the drill holes to ensure that the holes are plugged in accordance with the Rocky Mountain Well Abandonment Requirements. The abatement time given is 30 days, no later than November 27, 1982.

Mr. Allen Smith, North American Equity, who was contacted on several occasions before the citations were mailed, informed this inspector that both the exploration company (Sanders Exploration) and the landowner (Milton Jacob) had billed North American Equity for the work performed and so, to their knowledge, these sites were in compliance with the Notice of Intent at that time. This inspector unofficially granted a grace period for the noncompliance in light of the contractors' involvement. Following a one month period, no positive action was apparent. In regard to seasonal timing, no further time extensions were warranted.


SANDY PRUITT
FIELD SPECIALIST

cc: Tom Emmett, OSM
Allen Smith, North American Equity
Joe Harvey, Blazon Company
Inspection Staff

SP/btb

Statistics:

See Huntington #4 memo dated October 1982
Grant: A & E