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MT NEBO SCIENTIFIC, INC.

research & consulting

007/012 #2

December 10, 1993

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DIVISION OF
OIL, GAS & MINING

Daron Haddock, Permit Supervisor
STATE OF UTAH
Division of Oil, Gas & Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180

RE: Mid-Term Review Response: December 10, 1993 submittal
for the Wellington Preparation Plant (ACT/007/012).

Dear Mr. Haddock:

Enclosed please find two (2) copies of the final set of responses to the deficiencies from the Midterm Review (9/23/92) for Castle Valley Resources. The information is "insertable" to the existing MRP. Instructions for insertion to the MRP are also included.

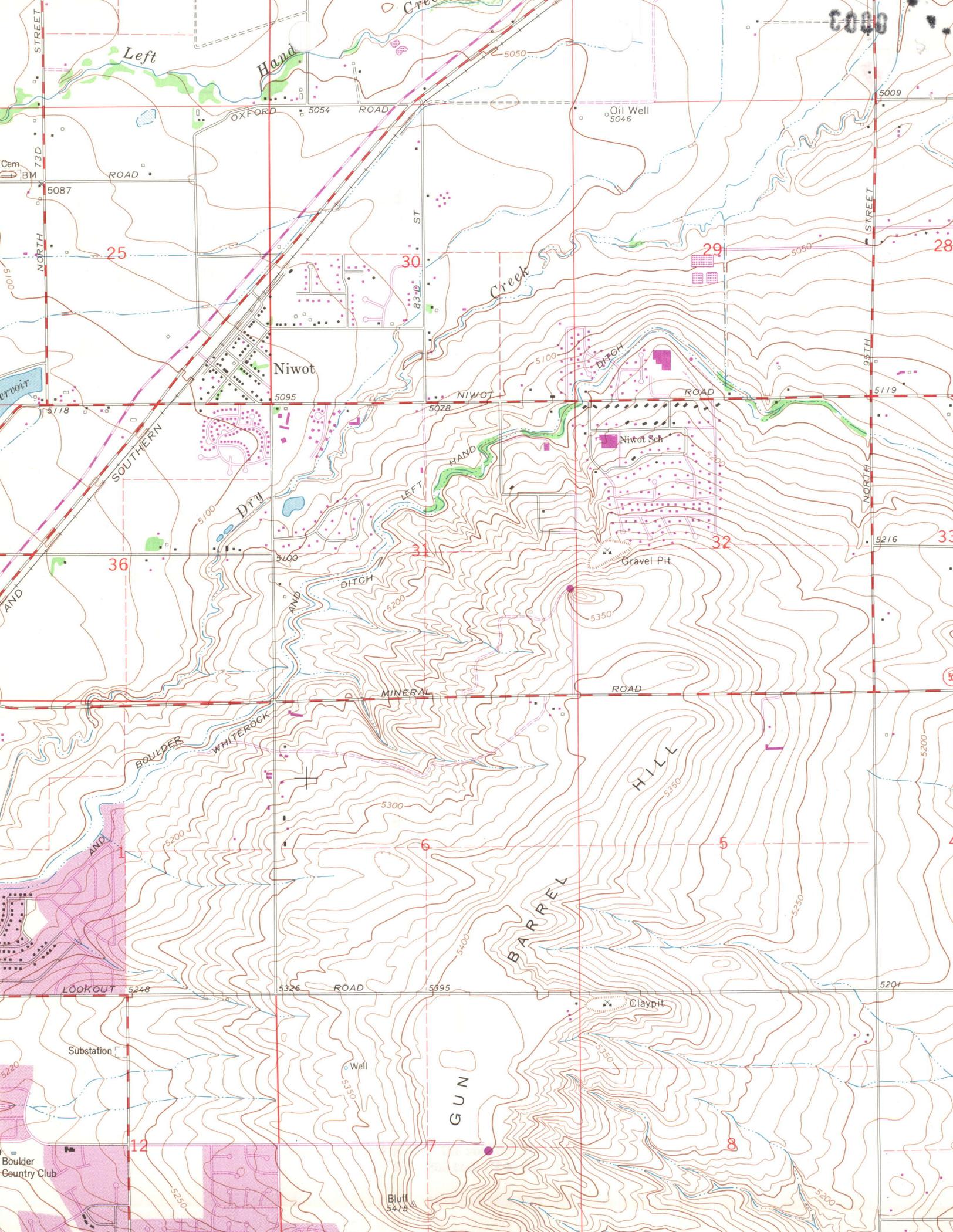
The deficiencies and responses are reported in two (2) sets as follows:

Set #1

- R645-301-233.
- R645-301-240.
- R645-301-242.
- R645-301-243.
- R645-301-244.
- R645-301-321.
- R645-301-341.100
- R645-301-341.210
- R645-301-341.220
- R645-301-341.230
- R645-301-341.250
- R645-301-341.300
- R645-301-412.
- R645-301-412.200
- R645-301-523.
- R645-301-553.250
- R645-301-553.260
- R645-301-623.
- R645-301-746.

Set #2

- R645-301-534.
- R645-301-542.
- R645-301-728.
- R645-301-731.300
- R645-301-746.200
- R645-301-746.311
- R645-301-747.
- R645-301-760.



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D. Haddock
12/10/93

If you have any questions or comments, please do not hesitate to call. Additionally, if you need our help to insert the information into the Division's copies of the MRP, please let us know. The help and consideration from you and your staff has been much appreciated.

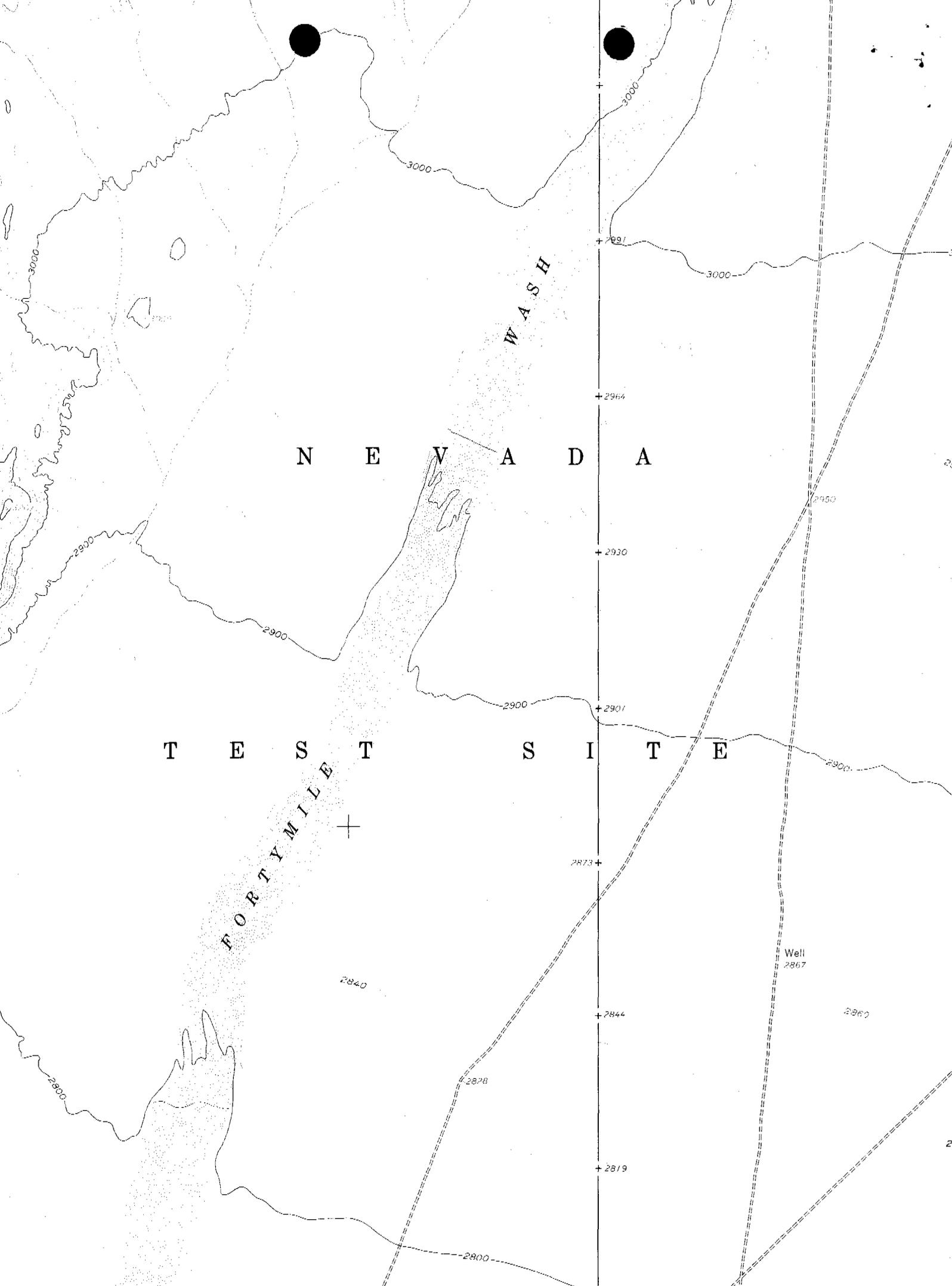
Sincerely,



Patrick D. Collins, Ph.D.

Enclosures

cc: S. Falvey
R. Hinckley
B. Mower
J. Marshall





State of Utah
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TO: Daron Haddock, Permit Supervisor

FROM: Wayne H. Western *WHW*

DATE: ~~December~~ 9, 1993

RE: Wellington Midterm 4th Submittal, Castle Valley Resources, Wellington Prep Plant, ACT/007/012, Folder #2, Carbon County, Utah

R645-301-522 Coal Recovery

Applicant's Proposal:

Previous owners washed coal at the Wellington site. Waste materials from the coal washing operation called coal fines were disposed in slurry ponds on site. In the current reclamation plan the fines will be buried in place.

The operator was granted authorization by the Division to conduct a pilot study program to remove the coal fines. The primary purpose of the pilot study is to compare methodologies and costs to remove the fines for reclamation and/or marketability.

Analysis:

R645-301-522 says that the permit application will include a description of the measures to be used to maximize the use and conservation of the coal resource. The description will assure that coal mining and reclamation operations are conducted to maximize the utilization and conservation of the coal, while utilizing the best technology currently available to maintain environmental integrity, so that re-affecting the land in the future through coal mining and reclamation operations is minimized.

The site is a loadout facility and no coal mining has occurred near the area. While the Division supports the idea of recovering coal fines rather than burying them there is nothing in R645-301-522 that requires coal fine recovery.

Deficiencies:

1. None.



R645-301-526
R645-301-526.100

Mine Facilities
Existing Structures

Applicant's Proposal:

Only a few modifications have been made to the existing buildings at the Wellington Preparation Plant. No modification or alteration of these facilities was required other than simple installation of a feed chute for transfer of the product into the system. It was proposed not to develop an engineering drawing for this slight alteration, but rather to construct on a field -fit basis.

In the future the operator will remove the dryer building. Pertinent maps will be updated and a report to DOGM submitted when this is accomplished.

No mining and reclamation activities currently occur within 100 feet of a public road. Furthermore, none are expected in the future. DOGM will be notified in the event that this status changes.

Analysis:

The Applicant says that some building will be modified or removed. Before modifying any buildings the Applicant must first submit detailed plans to the Division. The plans must include updated maps and construction schedules.

Removing the dryer buildings is part of the approved reclamation plan. Before demolishing and removing the building the Applicant must notify the Division of the time and sequence.

Deficiencies:

1. Before modifying any building the Applicant will update their Mining and Reclamation Plan. The updated MRP will include detailed plans, maps and drawings approved by the Division.
2. Before doing any reclamation work such as demolishing and removing the dryer building the Applicant will notify the Division to the time and sequence.

R645-301-526.200

Utility Installation and Support Facilities

Applicant's Proposal:

All coal mining and reclamation operations will be conducted in a manner which minimizes damage, destruction, or disruption of services provided by oil, gas, and water wells. The support facilities will be operated in accordance with a permit issued by the Division. Support facilities will be located, maintained, and used in a manner that: 1) prevents or controls erosion and siltation, water pollution, and damage to public or private property, and 2) to the extent possible using the best technology currently available.

Analysis:

The Applicant has committed to conduct all coal mining and reclamation operations in a manner that minimized damage, destruction, or disruption of services provided by oil, gas, and water wells.

Deficiencies:

1. None.

R645-301-534

Roads

Applicant's Proposal:

Primary roads have been designed, constructed and certified by a registered professional engineer. They meet or exceed standards to comply with requirements for stability, drainage, configuration, safety, maintenance, size, grade and other Division requirements.

The county maintains the Class I haul road to the Wellington site and the county road on the east side of the Price river. All other ancillary roads are maintained by the operator with equipment leased or maintained on site. In the events that the roads were to be damaged by a catastrophic event, such as a flood or earthquake, the Applicant has committed to repair the roads when practical.

Analysis:

The Applicant has designed the roads in accordance with R645-301-534. In the event that the roads were damaged by a catastrophic event the Applicant has committed to repair the roads as soon as practical.

Deficiencies:

1. None.

R645-301-528.320 Coal Mine Waste

Applicant's Proposal:

From 1958 to 1985 the Wellington plant received coal by rail, then cleaned and prepared it to be shipped away for use. In the coal cleaning process coal waste was produced and deposited on site. The coal waste was placed in two piles called the pond refuse pile and the plant refuse pile. Both piles have been approved by MSHA.

All coal waste to be placed in the existing disposal areas within the permit area that was approved for this purpose. Most of the refuse material east of the Price river was deposited pre-law. Current reclamation plans call for some refuse material to be used to enhance revegetation. Furthermore, plans are now being developed to use the piles and fines as fuels.

Another temporary rock and coal waste area has more recently been approved by the Division. Non-hazardous waste material could be received for the Crandall Canyon Mine. Disposal of the Crandall Canyon material at the Wellington site was a one-time exemption and allowed a total of 600 cubic yards of the material to be stored on site.

Analysis:

The pond and refuse piles have been approved by MSHA and meet the performance standards. The Crandall Canyon coal mine waste facility has been approved by the Division.

Deficiencies:

1. None.

R645-301-528.330 Noncoal Waste

Applicant's Proposal:

There is little noncoal waste associated with the present activities at the Wellington Preparation Plant. However, noncoal waste generated will be hauled off-site to appropriate waste disposal areas.

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Analysis:

The noncoal waste will be disposed in an approved disposal area.

Deficiencies:

1. None.

WEL4SUB.WHW