

March 10, 1999



**EarthFax**

Mr. Daron R. Haddock  
 Permit Supervisor  
 Division of Oil, Gas, and Mining  
 Department of Natural Resources  
 State of Utah  
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RE: Midterm Review Response of the Utah American Energy, Inc. (UEI), Horse Canyon Mine,  
 ACT/007/013, Folder #3, Carbon County, Utah

Dear Mr. Haddock:

*2* *Copy Daron (all)*

EarthFax Engineering, Inc ("EarthFax") has been requested by UEI to provide a response to the UDOGM Midterm Review of the Horse Canyon Mine Permit. Therefore, included as part of this letter or as an enclosure are:

- A response to the two items addressed in the Midterm Review,
- Copies of "Application for Permit Change" DOGM - C1 and C2 forms,
- Three copies of the proposed revision to the runoff control plan,
- Three copies of the revision to Chapter III for insertion into the PAP.

Following are the results of EarthFax's review of the two Midterm Review items presented to UEI in a letter from you dated December 23, 1998.

ITEM 1) UEI was asked to revise the drainage designs for handling runoff from the main surface facilities area (buildings) to ensure that runoff was conveyed to Sediment Pond No. 2.

RESPONSE: Based on field visits to the buildings area with DOGM personnel, the main area of concern is the portion of drainage flowing adjacent to and down the surface of the county road. This water is partially collected by diversion 19 on the east side of the county road and conveyed under the road by culvert 5.

UEI proposes to upgrade the collection of drainage by installing earthen berms on either side of the road to divert the road runoff to either the diversion 19 or to the inlet to sediment pond No. 2. Due to county maintenance procedures on the roadway, UEI cannot modify the road configuration.

Please find enclosed three copies of the proposed revision of the storm drainage control structures. If this concept is acceptable to DOGM, Plates II-3C and II-3D will be revised to reflect these changes.

ITEM 2) UEI requested to evaluate the substitute soil resources and fill materials that may be available within the permit area (portal and main buildings areas) that could be used during reclamation of the portal area to attempt to minimize the disturbance to the existing borrow area.

RESPONSE: Please find enclosed three copies of the revised section of Chapter III that details proposed changes to the reclamation plan. These changes will ensure that the site area is evaluated for substitute soil and fill materials prior to reclamation and the maximum amount of on-site materials will be used in the site regrading. Thereby, allowing the minimal amount of materials to be harvested from the borrow area.

If you have any questions regarding the items discussed or included with this letter, please call Mr. R. Jay Marshall at (435) 613-0393.

Sincerely,



Thomas J. Suchoski  
Project Manager

enclosures

c: R. Jay Marshall, UEI  
File UC0649-01



# APPLICATION FOR PERMIT CHANGE

Title of Change: Mid-term Review Comment Response

Permit Number: ACT / 007 / 013

Mine: Horse Canyon Mine

Permittee: Utah American Energy, Inc.

Description, include reason for change and timing required to implement: Response to DGM comments for Mid-term review.

- Yes  No 1. Change in the size of the Permit Area? acres  increase  decrease.
- Yes  No 2. Change in the size of the Disturbed Area? acres  increase  decrease.
- Yes  No 3. Will permit change include operations outside the Cumulative Hydrologic Impact Area?
- Yes  No 4. Will permit change include operations in hydrologic basins other than currently approved?
- Yes  No 5. Does permit change result from cancellation, reduction or increase of insurance or reclamation bond?
- Yes  No 6. Does permit change require or include public notice publication?
- Yes  No 7. Permit change as a result of a Violation? Violation #
- Yes  No 8. Permit change as a result of a Division Order? D.O.#
- Yes  No 9. Permit change as a result of other laws or regulations? Explain:
- Yes  No 10. Does permit change require or include ownership, control, right-of-entry, or compliance information?
- Yes  No 11. Does the permit change affect the surface landowner or change the post mining land use?
- Yes  No 12. Does permit change require or include collection and reporting of any baseline information?
- Yes  No 13. Could the permit change have any effect on wildlife or vegetation outside the current disturbed area?
- Yes  No 14. Does permit change require or include soil removal, storage or placement?
- Yes  No 15. Does permit change require or include vegetation monitoring, removal or revegetation activities?
- Yes  No 16. Does permit change require or include construction, modification, or removal of surface facilities?
- Yes  No 17. Does permit change require or include water monitoring, sediment or drainage control measures?
- Yes  No 18. Does permit change require or include certified designs, maps, or calculations?
- Yes  No 19. Does permit change require or include underground design or mine sequence and timing?
- Yes  No 20. Does permit change require or include subsidence control or monitoring?
- Yes  No 21. Have reclamation costs for bonding been provided or revised for any changes in the reclamation plan?
- Yes  No 22. Is permit change within 100 feet of a public road or perennial stream or 500 feet of an occupied dwelling?
- Yes  No 23. Is this permit change coal exploration activity  inside  outside of the permit area?

Attach 3 complete copies of proposed permit change as it would be incorporated into the Mining and Reclamation Plan.

I hereby certify that I am a responsible official of the applicant and that the information contained in this application is true and correct to the best of my information and belief in all respects with the laws of Utah in reference to commitments, undertakings, and obligations, herein.

R. J. Marshall Chief Engineer 3/10/99  
Signature - Name - Position - Date

Subscribed and sworn to before me this 10th day of MARCH, 1999.  
Sharon J. ...  
Notary Public

My Commission Expires: 10-24, 1999  
State of Utah  
County of Carbon

