



State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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April 6, 1999

TO: File

THRU: Joe Helfrich, Permit Supervisor

THRU: Daron Haddock, Permit Supervisor *Dez*

FROM: Robert Davidson, Soils Reclamation Specialist *RD*

RE: Mid-Term Review, Utah American Energy Corporation, Horse Canyon Mine, ACT/007/013-MT, File #2, Carbon County, Utah

SUMMARY:

The Division initiated the Horse Canyon Midterm on November 3, 1998 by sending a letter to Intermountain Power Agency and by conducting an on-site visit on December 9, 1998. In summary, the Field Visit report that was completed after our Horse Canyon site visit of December 9, 1998 which was done in conjunction with the Midterm Review identified the following two items that required further attention:

1. The drainage designs for handling runoff from the main surface facilities area (buildings) are inadequate and need to be revised.
2. There are substitute soil resources and fill materials available within the permit area that need to be identified and used during reclamation of the portal area.

Transfer of ownership from Intermountain Power Agency to UtahAmerica Energy, Inc. occurred on December 21, 1998.

UtahAmerica responded to the Division's initial Mid Term review dated December 23, 1998 on March 10, 1999. This Technical Analysis covers the soils portion of the review.

TECHNICAL ANALYSIS:

RECLAMATION PLAN

TOPSOIL AND SUBSOIL

Regulatory Reference: 30 CFR Sec. 817.22; R645-301-240.

Analysis:

Under Section 3.7, Topsoil Handling, the Mid-Term amendment states that prior to final reclamation of the remaining facilities area, an evaluation of the available substitute soils and fill materials within the permit area will be conducted to determine the volume of materials that can be used during reclamation of the manway portal and main buildings bench areas. Based on this evaluation, a determination will be made to see if additional fill and soils will be required from the existing borrow area.

The above information is inadequate to fulfill the requirements of locating the best available material within the permit area to accomplish reclamation. The operator must show that no available substitute material can be made suitable for achieving the revegetation standards prior to importing soil borrow material. The Mine Reclamation Plan must contain current and adequate information concerning topsoil and substitute topsoil resources.

Findings:

Information provided in the application is not considered adequate to meet the requirements of this section of the regulations. The applicant must provide the following in accordance with:

R645-301-120, R645-301-232.720 and R645-301-233, The Mine Reclamation Plan must contain current and adequate information concerning topsoil and substitute topsoil resources. The amendment must identify the best available material within the permit area to accomplish reclamation. Only in the event that enough suitable material can not be located within the permit area, then appropriate substitute soil material may be properly identified from the borrow area. Both scenarios will require additional soil survey work to locate, identify and utilize appropriate soil resources.