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STATE OF UTAH  
NATURAL RESOURCES  
Oil, Gas & Mining

Scott M. Matheson, Governor  
Temple A. Reynolds, Executive Director  
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4241 State Office Building • Salt Lake City, UT 84114 • 801-533-5771

November 15, 1983

Mr. Dan Guy, Manager  
Permitting and Compliance  
Beaver Creek Coal Company  
P. O. Box AU  
Price, Utah 84501

RE: Determination of Completeness  
Gordon Creek #2 Mine  
Southwest Lease  
ACT/007/016, Folder No. 2  
Carbon County, Utah

Dear Mr. Guy:

Enclosed please find a copy of the Division's Determination of Completeness (DOC) for Beaver Creek Coal Company's Gordon Creek #2 Mine, Southwest Lease.

The enclosed DOC review document contains several questions that were identified during the review. These items need to be clarified before the plan can be determined complete and the TA can be drafted. Therefore, please provide an adequate response to these questions on or before November 25, 1983.

Should Beaver Creek desire to meet with the Division staff or have any questions regarding this review, please contact me or Steve Cox of my staff immediately.

Sincerely,

JAMES W. SMITH, JR.  
COORDINATOR OF MINED  
LAND DEVELOPMENT

JWS/SC:btb

Enclosure

cc: Allen Klein, OSM  
Lou Hamm, OSM  
S. Cox, DOGM  
C. Young, DOGM

DETERMINATION OF COMPLETENESS

and

TECHNICAL DEFICIENCIES

Beaver Creek Coal Company  
Gordon Creek #2 Mine  
Southwest Lease  
ACT/007/016, Carbon County, Utah

November 15, 1983

DETERMINATION OF COMPLETENESS  
AND  
TECHNICAL DEFICIENCIES

UMC 782.15 Right of Entry and Operation Information

Figures 4-1a, 4-2a and 4-3 showing surface ownership, rights-of-way, mineral ownership, lands with legal right of entry, etc., are missing. Please provide these figures.

UMC 783.19 Vegetation Information

It is apparent from the data presented that the oak shrubland reference area is not comparable to the disturbed area. The applicant should commit to establishing a more representative reference area or should present acceptable baseline data.

A total 1.7 acres of aspen woodland and 2.7 acres of mixed conifer will be disturbed on the lease area. This is over half the expected disturbance (7.5 acres). Please indicate why these areas will not be returned to the original vegetative type.

On page 9-22 and in Table 9-1, it is stated that total disturbance will be 9.6 acres. Elsewhere in the text, the figure is given as 7.5 acres. Please clarify which is the correct figure.

In the legend for Plate 9-1, wet sedge areas are identified with a "M." This should be changed to a "W."

Table 9-8 is incomplete. There are no figures given under the heading "average ft<sup>2</sup>."

The sample adequacy statement at the top of page 9-28 is apparently misplaced. This should be deleted.

UMC 783.24 Maps: General Requirements

The applicant must show the powerline and the water supply system which will supply the new portals on Plate 3-1a.

UMC 784.11 Operation Plan: General Requirements

Please clarify the expected daily coal production and yearly production for the Gordon Creek #2 Mine incorporating information for the lease area.

UMC 784.12 Operation Plan: Existing Structures

(b) (1) The compliance plan for the conveyor should include the construction schedule which shows anticipated dates for beginning and completing interim steps and final reconstruction.

UMC 784.13 Reclamation Plan: General Requirements

(b)(3) The plan for backfilling should indicate the volumes of fill required to achieve the postmining topography.

Will the foundations be broken up before they are placed against the highwall prior to backfilling. How deep will they be buried.

(b)(2) The hourly costs for the equipment should be given and the type of equipment for each task (e.g, D-8K or 621-B scraper).

UMC 784.14 Reclamation Plan: Protection of Hydrologic Balance

(a)(1) Surface drainage from the disturbed area at the point where the drainage for the pad intersects the Class II access road does not appear to be routed into the sedimentation pond, but appears to have the potential of leaving the disturbed pad via the road.

The applicant must indicate how disturbed area drainage will be routed into the sediment pond from all locations on the mine portal pad area.

(b)(3) The surface water monitoring plan in the original Gordon Creek #2 Mine Plan is proposed unchanged to be used for the Southwest Lease. Surface water monitoring Station 2-7-W originally would reflect above mine water quality for the main fork of Bryner Canyon. With the installation of the Southwest Lease surface facilities Station 2-7-W will be impacted by surface facilities.

A new surface water monitoring station must be added to reflect above mine water quality for the Southwest Lease surface facilities. The existing surface water quality monitoring plans must be revised, including Plate 7-2.

UMC 784.16 Reclamation Plan: Ponds, Impoundments, Banks, Dams and Embankments

(a)(ii) The cross-section of the sediment pond shown on Plate 7-8 is incomplete. No depth dimensions are indicated.

The cross-section on Plate 7-8 must show dimensions for embankment height, spillway height, the sediment cleanout level and design depth of water with the emergency spillway flowing (25 year, 24-hour event).

(b)(1) The methodology used by the applicant to calculate the volume of storm runoff entering the pond does not appear appropriate. A weighted curve number approach provides a deflected runoff volume for pond design.

The applicant should re-evaluate the weighted curve number methodology used in Table 3-3 (page 3-28).

UMC 784.19 Underground Development Waste

It is indicated that there will be mining through rock slopes to get to the Hlawatha seam. Will surface waste rock disposal sites be needed? What types of volumes of waste rock are anticipated?

UMC 784.22 Diversions

Descriptions including maps and cross-sections of diversions are not complete. No cross-sections of undisturbed ditches DV-1, DV-3 or disturbed area ditches are shown. Additionally, no description, calculations or clear indication on Plate 7-6 exists for disturbed area drainage ditches. Specifications for the culvert routing disturbed area drainage into the sediment pond are not included. The inlet configuration is not shown for this culvert.

UMC 784.23 Operation Plan: Maps and Plans

See comment under UMC 784.22 and 784.24.

UMC 784.24 Transportation Facilities

The drainage ditch adjacent to the Class II Road is not shown on Plate 7-6 or 3-2a. The cross-section shown for the road does not provide dimensions. Sizing calculations for the ditch are not included in the plan.

No specifications are included in the plan for the inlet or outlet configurations and erosion protection measures for the cross culverts associated with the Class II Road. Protection measures for conveying culvert outflows down the fill slopes and safely into the Bryner Canyon drainage channel are not specified in the plan. Sediment control for the road drainage is not indicated.

The drainage ditch adjacent to the Class II Road must be shown on appropriate maps (e.g., Plate 7-6). Cross-sections with dimensions and sizing calculations for the ditch must be included in the plan.

Specifications and a complete description of inlet and outlet erosion protection measures for culverts associated with the Class II Road must be included.

The methodology for conveying culvert outflow down fill slopes demonstrating erosion protection measures must be included.

Descriptions, plans, drawings and calculations to achieve sediment control for road drainage must be incorporated into the plan.

UMC 786.19 Criteria for Permit Approval and Denial

Information indicating that contemporaneous reclamation at the minesite has been successful must be provided.

Further, designs for field experiments must be submitted, be they for Gordon Creek #3 and #6 or otherwise.

UMC 817.22 Topsoil: Removal

(e) On-site field and/or greenhouse tests have not be addressed by the applicant to demonstrate the feasibility of the utilization of in-situ materials. Detailed plans depicting all treatments to be performed are needed to determine the completeness of the plan.

The operator identifies (page 8-28) materials in the vicinity of sample location No. 3 as being unsuitable. Beaver Creek should elaborate on what is needed in the way "of more analysis . . . to better define the extent of the possible unsuitable materials." The tests to be performed, attendant timeframes as well as the volume and fate of any unsuitable materials should be detailed.

The volume of the fill total must be provided to lend meaning to the statement on page 3795 to the percentage of the fill considered "contaminated." Bonding calculations for the removal and transport of this portion must be provided.

The volume of topsoil/substitute material which exists along the road shoulder specifically must be provided.

UMC 817.97 Protection of Fish, Wildlife and Related Environmental Values

Please present a more detailed discussion of the elk crossings along the conveyor including crossing designs. The applicant should commit to mitigate effects to elk and mule deer if the crossings along the temporary conveyor system are found by the Utah Division of Wildlife Resources to comprise a significant barrier to migration.

No mention is made of possible impacts to Williamson's sapsuckers, a species of "high federal interest," on the site. Please explain why.

UMC 817.162 Roads: Class II: Design and Construction

What is the geologic orientation of the slip planes in the rock for the road in the cut slope of 1V:33H? The 40 degree slope (300 percent slope gradient) in unconsolidated material for the slope should be elaborated upon. What is the soil particle size? Please explain.

How was the road located to minimize downstream sedimentation and flooding?

How will maintenance to control erosion, repair structures and drainage system, replacement of surface and restoration o the road prism be done for the road?

UMC 817.180 Other Transportation Facilities

The conveyor construction and maintenance should be done to prevent damage to fish and wildlife, additional contributions of suspended solids to streamflow or runoff outside the permit area as well as control abd minimize diminution or degradation of water quality and quantity.