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STATE OF UTAH
NATURAL RESOURCES
Oil, Gas & Mining

Norman H. Bangerter, Governor
Dee C. Hansen, Executive Director
Dianne R. Nielson, Ph.D., Division Director

355 W. North Temple • 3 Triad Center • Suite 350 • Salt Lake City, UT 84180-1203 • 801-538-5340

January 15, 1986

Mr. Dan W. Guy, Manager
Permitting and Compliance
Beaver Creek Coal Company
P. O. Box 1378
Price, Utah 84501

Dear Mr. Guy:

RE: Conditional Approval for Temporary Storage of Sediments,
Abatement Plan for Notice of Violation N85-8-17-1, Gordon
Creek #2 Mine, ACT/007/016, 3, 4 & 7, Carbon County, Utah

The Division has completed the review of Beaver Creek Coal Company's (BCCC) abatement plan, received November 15, 1985, which was submitted in response to the Notice of Violation (NOV) referenced above. Until supplemental information is provided and deemed sufficient, the plans and proposed storage location can only be considered acceptable as a temporary solution for disposal of the sediments from the #2 Mine at the #3 and #6 Mines site. Final approval for the ultimate disposal of the stockpiled sediments will be resolved as part of the ongoing technical review of the reclamation plan for the #3 and #6 Mines.

The following technical review comments have been developed regarding deficiencies to be addressed prior to further consideration for permanent disposal of the sediments:

UMC 817.103 Backfilling and Grading: Covering Coal and Acid-
and Toxic-forming Materials - EH & PGL

The operator has not adequately addressed this section. The following questions must be addressed and the appropriate information should be included in the Mining and Reclamation Plan (MRP) for the Gordon Creek #3 and #6 Mines:

- (1) The sediment analysis presented by BCCC indicates moderate to high levels of soluble salts (ECe) in three of the five sample sites (8.0, 8.8 and 11.5 mmhos/cm). Further, one sample has what seems to be a high level of manganese (1,800 ppm). Both soluble salts and manganese are at levels that pose potential toxicity to vegetation.
- (2) The site for disposal of a portion of the sediment is located on an area of a high percent of coal fines that may have to be removed before final reclamation. At the present time, the Division is awaiting calculation on the amount of coal fines present in this area.

It is recommended that:

- A. An alternative site be found for the disposal of the sediment located on the coal fines area.
 - B. Additional samples be analyzed to see if the high level of manganese is typical of the sediment. A soil specialist from the Division must be present during sampling.
 - C. Existing analytical data would require that the sediment be covered by four feet of nontoxic soil to eliminate the possibility of plant roots coming in contact with the high levels of EC and manganese.
- (3) Is this the only time sediments have been disposed of at this site?

Does BCCC anticipate disposing of additional sediment at this location prior to reclamation of the #3 and #6 Mines site(s)?

- (4) What is the entire quantity of material that was (or will be) disposed of at this site location?

How deep will the material be spread against the highwall? It is difficult to interpret from the map of the indicated locations what this depth will be.

- (5) How will the material be compacted?

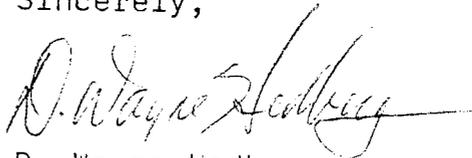
Page 3
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ACT/007/016
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By letter dated January 13, 1986 from Thomas Wright of the Inspection and Enforcement section, the operator has until February 3, 1986 to obtain approval to store the material at the #3 and #6 Mines or return the material to an alternate site at the Gordon Creek #2 and #7 Mines.

In clarification of that letter, the operator must provide a written acceptance to the conditions of this letter and a commitment to abide by the Division's final requirements for ultimate disposal and reclamation of this stockpiled material (to be resolved as part of the ongoing review of the reclamation plans for the #3 & 6 mines). This written response must be received by February 3, 1986.

Thank you for your cooperation in resolving the remaining concerns. Please contact me or John Whitehead should you have any questions.

Sincerely,



D. Wayne Hedberg
Permit Supervisor/
Reclamation Hydrologist

dwh
cc: Allen D. Klein
Lowell P. Braxton
Pam Grubaugh-Littig
Ev Hooper
Dave Lof
John Whitehead
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