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STATE OF UTAH
NATURAL RESOURCES
Oil, Gas & Mining

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January 11, 1988

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

Dear Mr. ^{Dan} Guy:

Re: Mid-Term Review Deficiencies, Beaver Creek Coal Company, Gordon Creek #2 and #7 Mine, ACT/007/016, Folder #2, Carbon County, Utah

The Division technical staff have reviewed the Mid-Term Review response submitted by Beaver Creek Coal Company on November 18, 1987. Several items have not been responded to adequately as enumerated on the attached review. Most notably, information relating to design criteria for the permanent diversion of the North Fork of Gordon Creek (adjacent to the Sweets Canyon Pond), specifications for the retention of the Sweets Canyon Pond as a permanent impoundment, and specific riprap, filter blanket and energy dissipator designs for all channels (e.g., Bryner Canyon) to be reclaimed have not been provided as requested in the Division's May 28, 1987 letter.

The Division is very anxious to complete the Mid-Term Review on the Gordon Creek #2 and 7 mines. Beaver Creek Coal Company is hereby requested to completely and adequately respond to the attached deficiencies by February 19, 1988. Failure to do so may force the Division to issue appropriate enforcement action.

Please feel free to contact me or John Whitehead should you have any questions on this matter.

Sincerely,

Lowell P. Braxton
Administrator
Mineral Resource Development
and Reclamation Program

djh
cc: P. Rutledge R. Hagen
J. Whitehead J. Fricke
P. Grubaugh-Littig
B. Stettler

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MID-TERM REVIEW DEFICIENCIES

BEAVER CREEK COAL COMPANY
Gordon Creek #2 and #7 Mine

December 31, 1987

UMC 771.23 Permit Application: General Requirements for Format and Contents-(PGL)

A revised Plate 3-1a was not submitted in Beaver Creek Coal Company's (BCCC) submittal. Plate 3-1a as submitted in the May 1986 Mid-Term Response should be replaced by the Plate 3-1a which depicts the Sweets Canyon water truck fill up area (approved June 1985 by DOGM).

UMC 817.49 Hydrologic Balance: Permanent and Temporary Impoundments-(JRF)

The Division requested that BCCC (May 28, 1987) provide information demonstrating that the Sweet's Canyon pond meets the requirements for permanent impoundments. BCCC has not adequately responded to this request. The following sections of UMC 817.49 must be specifically addressed:

(a)(1) Provide water analysis of the impounded water. Discuss how the water shall be suitable on a permanent basis for the intended use. Please state what the intended use will be for this impoundment.

(a)(2) Please provide discussion on how the water level will be maintained for the intended use.

(a)(3) Adequate safety and access to the impounded water must be demonstrated for the proposed water users.

(a)(6) Demonstrate the pond is of adequate size for the intended use.

(a)(7)(c) The non-certified, Sweet's Canyon Proposed Pond Modification Cross-Section (Plate 3-1A(2), dated March 7, 1985, (approved June 24, 1985) does not meet the 2h:1v sideslope requirement. Please submit certified as-built plans that demonstrate compliance with the 2h:1v criteria.

(a)(h) The operator must submit a certification report that includes:

1. Monitoring procedures
2. An annual certification report methodology that complies with UMC 817.49 (h)(2)(3)(4)

The MRP contains conflicting plate identifications. There are two 3-1A plates. One is identified as the Gordon Creek No. 2 Mine and No. 7 Mine Surface Facilities. The other is identified as the Sweet's Canyon (As-Built). This discrepancy must be corrected.

UMC 817.44 Hydrologic Balance: Stream Channel Diversions - (JRF)

The operator's response to the deficiency noted in the May 28, 1987 Mid-Term Review under UMC 817.41 is not adequate for approval of the permanent diversion of the North Fork of Gordon Creek. Page 7-65 of the response indicate that the channel slope is 0.0033 percent above the drop structure. Division calculations indicate that the slope is .0033 ft./ft. Furthermore, as-built drawings for the pond and associated channel riprap do not show a drop structure as existing; reference to the drop structure should be deleted from Page 7-65.

To facilitate review of the permanent diversion, the following information is required:

1. An as-built longitudinal profile of the entire diversion, including undisturbed sections of the stream immediately upstream and downstream of the diversion, in accordance with UMC 817.44(d)(3).
2. Please provide undisturbed stream channel cross-sections (with elevations) immediately upstream and downstream of the stream diversion. Furthermore, submit diversion cross-sections at the pond inlet, and at each channel slope change.
3. Please provide velocity calculations for the channel at each slope change (immediately above pond inlet, between inlet and pond outlet, and at the downstream diversion-natural channel transition zone). All parameters utilized for velocity calculations must be justified.
4. Depth of flow calculations and associated diversion freeboard must be presented for each channel slope break.

5. Division calculations indicate high velocities (100 year-24 hour storm) for the diversion channel at the pond headgate (11 fps), between the headgate and pond spillway (5.3 fps) and at the riprapped channel-spillway (19.7 fps). Channel materials (bed and bank) must remain stable at these velocities. Please provide standard engineering designs that demonstrate stability for the channel materials.
6. Riprap calculations must be provided that demonstrate stability for the 100 year - 24 hour runoff flow (362cfs). On page 7-65, under Riprap Sizing, reference is given to the drop structure; again, according to the approved as-built drawing (Plate 3-1A), a drop structure does not exist. Please rectify this discrepancy.

The operator's response (October 1, 1987) to paragraph four of the May 28, 1987 Mid-Term Review is not adequate. The Division requested that channel depths be calculated on minimum slope calculations and riprap D₅₀ calculated on maximum slope requirements. Flow requirements must reflect the 100 year - 24 hour design criteria.

Items C and E, under UMC 817.44, in the March 24, 1986 Mid-Term Review and referred to in the May 28, 1987 review still remain outstanding. These items must be addressed.

The Division has requested specific riprap, filter blanket, and energy dissipator designs for all reclaimed channels in the March 24, 1986 and May 28, 1987 Mid-Term Review transmittals. Further delay in providing this information may result in enforcement action.

UMC 817.122 Post-Mining Land Use-(BAS)

Page 3-74 indicates that the water truck fill-up pond will not be reclaimed, but will be left for the landowner. The MRP must include a letter from the landowner, stating that this is acceptable.

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