

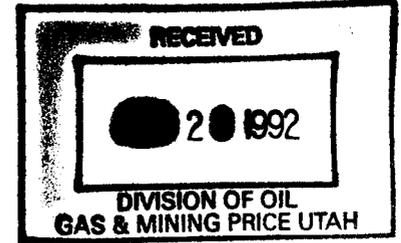
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Mountain Coal Company

Trail Mountain Mine
Post Office Box 1378
Price, Utah 84501
Telephone 801 637-5050 (Price Office)
801 637-5203 (Mine Office)
801 748-2140 (Mine Site)



August 19, 1992



Ms. Pamela Grubaugh-Littig
Utah Division of Oil, Gas & Mining
355 West North Temple
#3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

Attention: Jesse Kelly

Re: Division Order D091-A
Highwall Reclamation Plans
Gordon Creek No. 2/7/8 Mines
ACT/007/016
Carbon County, Utah

#2

Dear Ms. Littig:

In accordance with our agreement, Mountain Coal Company is herein submitting a plan for the backfilling of the Gordon Creek highwalls. Enclosed are 3 copies of the revised post-mining topography, cross-sections and mass balance sheet, along with the stability analysis for the No.2 Mine highwall. All plates and pages are numbered and should replace corresponding numbers in the plan. The stability analysis should be added to Appendix 12.

The following is a brief explanation of the backfilling plan for each of the highwall areas:

- (1) No. 8 Mine - The highwall will be completely eliminated as shown on the enclosed plan and in previous submittals;
- (2) No. 7 Mine - The highwall will be reduced based on the stability analysis, as shown in our April 28, 1992 submission to the Division (this area is unchanged on the enclosed plan);
- (3) No. 2 Mine - The portal highwalls will be reduced and/or eliminated based on the enclosed stability analysis for this site. The maps and mass balance have been changed to reflect the proposed backfilling. The extent of backfilling is based on a safety factor of 1.3 and a slope angle of 20°, which allows for a maximum height of 115'. The 1.3 factor of safety is considered adequate for this site, since there are no known seeps in the

highwalls, except for the one shown at the extreme upper end of the site, and adequate room is available to extend the slope across the pad areas. Minor slope modifications have been made to accommodate the Right Fork drainage and the seep at the upper end; however, the safety factor has not been reduced below 1.3 nor increased above 1.5 in any event. It should be noted that the seep will be drained in a surface channel rather than underground to promote stability of the backfill area and to allow for containment of the drainage for wildlife watering.

The revised Mass Balance shows the new fill requirement for the total property to be 188,000 cubic yards, including topsoil and soil substitute. The required fill material is assumed available based on recent deep (10'-12') sampling on the No. 2 Mine site.

It is our hope this revised plan will meet with your approval. These plans will also be included in the revised reclamation plan to be submitted by December 18, 1992. We are prepared to implement the backfilling operation as per our agreement, upon your approval.

If you have any questions or need any additional information, please contact me

Respectfully,



Dan W. Guy
Manager of Permits and Compliance

DWG/cr

Enclosures

cc: Scot Anderson
Johnny Coffey
File

Order D091-A