

0036



State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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

355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203
801-538-5340

January 24, 1992

Mr. Dan Guy, Manager
Mountain Coal Company
P.O. Box 1378
Price, Utah 84501

Dear Mr. Guy:

Re: Denial of Reclamation Plan for Highwalls, Road, and Ponds, Division Order, Mountain Coal Company, Gordon Creek #2, #7, and #8, Mines, ACT/007/016-DO-91A, Folder #2, Carbon County, Utah

Enclosed please find the deficiencies associated with the Division Order for the reclamation of the Gordon Creek #2, #7, and #8 Mines. Please submit complete and adequate information relative to this Division Order by February 26, 1992. These issues need to be resolved in a timely manner so that reclamation can be accomplished this year.

If you have any questions, please call me.

Sincerely,

A handwritten signature in black ink, appearing to read "Pamela Grubaugh-Littig".

Pamela Grubaugh-Littig
Permit Supervisor

pgl
Enclosure
cc: Jesse Kelley



State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

Norman H. Bangerter
Governor

Dee C. Hansen
Executive Director

Dianne R. Nielson, Ph.D.
Division Director

355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203
801-538-5340

January 24, 1992

TO: Pamela Grubaugh-Littig, Permit Supervisor

FROM: Jesse Kelley, Reclamation Engineer *JK*

RE: Revision of Reclamation Plan to Include Highwalls, Pads, Road, and Ponds, Mountain Coal Company, Gordon Creek 2, 7 & 8 Mine, ACT/007/016-DO91A, Folder #2, Carbon County, Utah

SYNOPSIS

The Operator permanently discontinued operations at this site in December of 1990. Reclamation was, at that time, scheduled to begin during the summer of 1991. However, in reviewing the Reclamation Plan, the Division found that the plan improperly provided for retention of highwalls, in contravention of the R614 (now R645) rules, which went into effect April 12, 1990. Therefore, the Division ordered the Operator, in a June 6, 1991 Division Order (DO-91A), to bring the Reclamation Plan into compliance with the R614 (now R645) rules.

The Operator responded to the Division Order on December 13, 1991 by submitting a revised Reclamation Plan for Division approval. This memorandum constitutes an analysis of the revised Reclamation Plan.

ANALYSIS

The revised Reclamation Plan is entirely inadequate. The revised Reclamation Plan complies with the requirement for designating an alternate postmining land use and then simply states, "From this point on the R614-302 requirements are satisfied by the existing, approved plan,". The original plan, however, is not consistent with what the Operator plans to do. If the original plan is to be cited as part of the new plan, then it must be updated to describe what the Operator has in mind for this site. A few examples should suffice to illustrate the problem.

1. The revised Reclamation Plan does not deal with the #2 highwalls at all, except to say that they will "also be retained to the extent shown on Plate 3-7, per the previously approved plan." The Operator must show justification for retaining the #2 highwalls, in accordance with the R614 (now R645) rules.
2. Page 3-74A of the original plan says that sediment ponds will be removed during Phase II of final reclamation. The new plan, however, is to keep the sediment ponds as stock ponds.
3. Is there to be a catch basin for water from the seep at the #7 area? If so, it must be shown on Plate 3-7B and other relevant maps.
4. Plate 3-7B indicates, by contour lines, that the road between the #2 and #7 areas is to be recontoured. Is this the plan? If not, then the map must be corrected.
5. Page 3-76.1 of the original plan says that highwalls (banks) along the road and pad areas are to be reduced. Is this still the plan?
6. Page 3-79 shows a typical cross-section of a reclaimed road. Are roads, particularly the road between the #2 and #7 areas, to be put in this final configuration? If not, then page 3-79 must be removed or modified.
7. Are the volume estimates on page 3-83 and 3-83.1 still valid? Where did they come from? The derivation of volume estimates needs to be explained in the text.
8. The original plan lacks detail regarding the Sweet's Canyon pond. Is it within the disturbed area? What is to be done with it?
9. Is Plate 3-7A correct with the revised plan? It shows no road retained in the #2 area or above.
10. Plate 3-8 is not correct. It shows, among other things, the sediment pond being filled in during final reclamation. This must be corrected and the Operator must make sure that all cross-sections accurately represent the anticipated final land surface configuration.

11. Plate 3-8B contains cross-sections, the locations of which are supposed to be shown on Plate 3-7A. The cross-sections, however, are not right for Plate 3-7A.
12. The cross-sections on Plate 3-8A are not located on Plate 3-8B, as Plate 3-8A says they are.

The foregoing is not necessarily a complete list of all the inconsistencies and problems between the new and original plans. All of the inconsistencies must be corrected. In addition, the Operator must explicitly show, in the revised plan, how he plans to comply with all of the R614 (R645) rules governing retained highwalls.

RECOMMENDATIONS

It is recommended that the December 13, 1991 submittal be rejected and that the Operator be required to submit a comprehensive, consistent revised Reclamation Plan.

MRPREVGC.JK