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Deficiencies

ACT/007/016

June 3, 1993

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TO: Pamela Grubaugh-Littig, Permit Supervisor

FROM: Jess Kelley, Reclamation Engineer *JK*

RE: Deficiencies in Gordon Creek #2, #7 & #8 Reclamation Plan Submitted May 10, 1993, Mountain Coal Company, Gordon Creek #2, #7 & #8 Mine, ACT/007/016, Folder #2, Carbon County, Utah

SYNOPSIS

I have reviewed the reclamation plan submitted May 10, 1993 and have found a number of deficiencies.

ANALYSIS

The reclamation plan for this site still has a number of deficiencies:

- 1) The plan is still in need of editing. It was my understanding that this plan was to stand on its own as a complete, independent document, but there are still many references--some of them incorrect--to the plan which was submitted February 2, 1993. While this may seem like a small matter, the editing problems make the plan confusing and hard-to-follow. For example:



- a) Page 3-18 mentions Table 8-2 and states that it contains topsoil volumes. There is no Table 8-2 in the latest plan. There is a Table 8-2 in the February 2, 1993 plan, but it contains no topsoil volumes.
 - b) Page 3-18 mentions Plate 8-1a, but Plate 8-1a does not exist.
 - c) Page 3-18 mentions Plate 3-1, which is only found in the February 2, 1993 plan.
 - d) Page 3-19a mentions Plate 8-1, which is only found in the February 2, 1993 plan.
 - e) Page 3-20 mentions Plate 9-1, which is only found in the February 2, 1993 plan.
 - f) Page 3-28 mentions Plates 3-3, 3-4, and 3-5, which are only found in the February 2, 1993 plan.
 - g) Plate 3-43 mentions Plates 3-11 and 3-12, which are only found in the February 2, 1993 plan.
- 2) Pages 3-45 and 3-46 state, as one justification for retaining Sweets Pond, that the embankments of the Pond are revegetated. There is, however, no demonstration in the plan that the pond embankments are revegetated to the regulatory standards (see R645-301-356).
 - 3) Page 3-46 states, as justification for retaining the old fan portal in its present configuration, that the area is revegetated. There is, however, no demonstration in the plan that this area is revegetated to the regulatory standards (see R645-301-356).
 - 4) To avoid confusion, Plate 3-2, *Surface Facilities*, which shows the old fan portal area as it will be during Phase 1 of reclamation, should instead be labeled "Plate 3-7B--

Final Reclamation (Phase 1)," and Plate 3-7B should instead be designated "Plate 3-7C."

- 5) Cross sections 44+00 and 46+00 (Plate 3-8E) show cut and fill work being done in the area of the old fan portal. Yet the text (page 3-38a) says that no earthwork will be done in this area.
- 6) Plates 3-7 and 3-7A show two channels draining the bench above the #7 fill; one armored with riprap and the other unarmored. Either one of these channels must be eliminated or else both must be armored.
- 7) There is no provision in the plan for sediment control in the area immediately below the pond during Phase 2 reclamation, after the pond has been removed.
- 8) Plates 3-2 and 3-7B show a fairly large natural channel crossing the reclaimed lower access road near the entrance gate. This channel now goes into a 30-inch CMP culvert which goes beneath the road. However, Plate 3-7B shows this channel in its final configuration as an unarmored channel, with no sediment control, which crosses the reclaimed road and flows inexplicably through a silt fence into the main undisturbed channel. There are three problems with this design: 1) there is commingling of undisturbed drainage from above the fill with disturbed drainage from the surface of the fill; 2) the reestablished channel across the fill is unarmored; and 3) there is no sediment control to prevent entry into the undisturbed drainage of sediment from the surface of the fill. Obviously, this channel must be properly designed.

RECOMMENDATIONS

The permittee must correct the deficiencies listed above before the reclamation plan can be approved.