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TO: Pamela Grubaugh-Littig, Permit Supervisor

FROM: Jess Kelley, Reclamation Engineer

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

SYNOPSIS

On February 1, 1993, the permittee submitted, for Division approval, a revised reclamation plan. The revision of the reclamation plan was mandated by Division Order DO-91A. This writer has reviewed the revised plan and has found a number of deficiencies.

ANALYSIS

Deficiencies in the revised reclamation plan are as follows:

1) Paragraphs 4 and 6 of page 3-18 should refer to Plate 3-1, and not Plate 3-1a. Also, the last paragraph of page 3-26 should refer to Plate 3-9 rather that to Figure 3-2.

2) Page 3-10 of the revised plan states that the premining land use of wildlife habitat will be retained. But the new pond and the stock watering basin are clearly meant for livestock use, so the postmining land use will be wildlife habitat and livestock. The permittee must change the designated postmining land use. It must be remembered that such a change constitutes a significant permit revision (see R645-301-414.200).

3) Nowhere in the plan is there any demonstration that the anticipated variances from Approximate Original Contour (AOC) have met the

requirements for such variances which are found in R645-302-270. It must be remembered that any variance from AOC constitutes a significant permit revision (see R645-301-414.200) since it involves a change in the postmining land use. The anticipated variances are:

a) The #7 Mine highwall--The stability analysis which the permittee has done of this area is necessary, but not sufficient, to allow for the retention of the #7 highwall.

b) The #2 Area cutslopes--As with the #7 Mine, the stability analysis is necessary, but not sufficient, to allow for the retention of these cutslopes.

c) The New Pond--On page 3-34 of the revised reclamation plan, the permittee states that the new pond is to be retained as a permanent feature after final reclamation. Since the new pond constitutes a variance from AOC, it is necessary to show that it meets the requirements of R645-302-270.

d) Sweets Pond--On page 3-35 of the revised plan, the permittee states that Sweets Pond is to be retained as a permanent feature after final reclamation. As with the new pond, Sweets Pond constitutes a variance from AOC. And the landowner's written request that it be retained, which is found in the revised plan, is necessary, but not sufficient, to allow for its retention.

4) There are deficiencies in the maps:

a) Maps 3-1 and 3-7 do not show the entire disturbed area. These maps do not show the lower road from the #2 sediment pond to the main gate or the area of Sweets Pond.

b) The disturbed area boundaries as shown on Plates 3-1 and 3-7 are incorrect. The disturbed area boundary does not include the #7 highwall on either map. The disturbed area boundary appears to exclude the full extent of potential disturbance along the restored main channel. Plate 3-7 even shows a riprap channel going outside of the disturbed area near the #2 sediment pond.

5) The mass balance table found on page 3-47 of the revised plan contains a number of discrepancies:

   a) The fill subtotal should be 177,762; not 117,762.

   b) Where do the volumes for the lower road come from? The lower road is not shown on any of the permit maps and there are, therefore, no cross sections for it anywhere in the plan.

   c) Page 3-18 of the plan says that 8000 yd^3 of topsoil were saved from the #7 area. Where does this figure come from?

   d) Page 3-45 of the plan says that 6451 yd^3 and 8000 yd^3 of substitute topsoil are available. This is obviously the source of the "Plus 7/8 Topsoil" figure of 14,451 yd^3 shown on page 3-47. Where does the figure of 6451 yd^3 come from? Where is it stored?

   e) Page 3-19 of the plan says that 1425 yd^3 of topsoil were saved from the #8 area. The difference between 1425 and 6451 (see d above) is 5026 yd^3. Where is this material stored and where did the figure come from?

   f) Where does the "Plus #2 Topsoil Sub." figure of 14,842 shown on page 3-47 come from?

6) The problem of the seep in the #8 area is not addressed in the plan. If covered over with earth material, as shown in the plan, this seep could destabilize the fill.

7) The old fan portal near the main gate is a postlaw structure, and yet the plan does not mention it. The reclamation of the old fan portal and its access road must be addressed in the plan.

8) Figure 3-9, page 3-41 of the plan shows a very general, typical cross section of a reclaimed road. This, however, is not specific enough. Using relevant stability data, the permittee must determine the maximum fill slope which will attain the required stability and commit to reclaiming the roads to that slope.

9) The reclamation cost estimate on pages 3-61 and 3-62 of the plan is not adequate. This cost estimate is a summary, but nowhere in the plan is it shown how the time and cost estimate figures in that summary were calculated.

RECOMMENDATIONS

It is recommended that the permittee correct the above deficiencies before the revised reclamation plan can be approved.

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