



State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

Michael O. Leavitt
Governor

Ted Stewart
Executive Director

James W. Carter
Division Director

355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203
801-538-5340
801-359-3940 (Fax)
801-538-5319 (TDD)

TO: File

DATE: June 16, 1994

FROM: Jess Kelley, Reclamation Engineer *JK*

RE: Deficiencies in Reclamation Plan, Mountain Coal Company, Gordon Creek 2, 7 & 8 Mine, ACT/007/016, Folder No. 2, Carbon County, Utah

SYNOPSIS

Pursuant to discussions between the Division and the operator, this writer has reviewed the reclamation plan submitted by the operator in August of 1993.

ANALYSIS

The plan still contains the following deficiencies:

- 1) On page 3-45 is a request for a variance from Approximate Original Contour (AOC) to make Sweets Pond a permanent impoundment. However, a permanent impoundment can be created in accordance with R645-301-733.220 and does not require a variance from AOC. This request and any other reference to Sweets Pond as a variance from AOC must be removed from the plan.
- 2) The plan states that the Old Fan Portal was reclaimed in 1983 under the Interim Regulations, but contains no documentation regarding the reclamation of that area. If it cannot be shown that the Old Fan Portal area was reclaimed in accordance with the Interim Regulations, then it will have to be reclaimed, and the highwall eliminated, in accordance with the R645 rules.
- 3) On page 3-46 is a request for a variance from AOC to allow partial retention of the Access Road cut bank. However, partial retention of a road cut bank for reasons of final fill stability does not require a variance from



AOC requirements. The backfilling of road cuts in final reclamation is simply governed by the general stability requirement of R645-301-553.130 and, of course, by the specific requirements of R645-301-534. This request and any other reference to a variance from AOC for the Access Road must be removed from the plan.

4) On page 3-46a is a request for a variance from AOC to allow partial retention of the No. 7 Access Road cut bank. However, partial retention of a road cut bank for reasons of final fill stability does not require a variance from AOC requirements. The backfilling of road cuts in final reclamation is simply governed by the general stability requirement of R645-301-553.130 and, of course, by the specific requirements of R645-301-534. This request and any other reference to a variance from AOC for the No. 7 Access Road must be removed from the plan.

5) According to the plan, the highwall in the No. 7 area will be partially retained. Neither the Federal regulations nor the R645 rules, however, allow for the retention of highwalls in post-SMCRA areas. Since the No. 7 area was created in 1983 and is, therefore, a post-SMCRA area, the highwall must be completely eliminated.

6) The plan states that the seeps in the No. 7 and No. 2 area are so small, and their flow velocities so low, that they will be allowed to flow in unarmored channels over bare fill. However, for the sake of caution, to prevent these seeps from saturating the fills and jeopardizing their stability, the channels in which they flow should be armored. This armor might be something simple like a layer of filter fabric beneath a layer of minus 3-inch rip rap.

RECOMMENDATIONS

It is recommended that the deficiencies listed above be corrected before the plan can be approved and reclamation of this site allowed to proceed.

cc: Daron Haddock
Pamela Grubaugh-Littig