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

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February 7, 1997

Paige B. Beville, Manager
Environmental, Health & Safety
Mountain Coal Company
ARCO Coal Company
555 17th Street, Room 2170
Denver, Colorado 80202

Re: Highwall Survey: OSM/DOGM Evaluation Plan, Folder #3, ACT/007/016, Mountain Coal Company, Gordon Creek 2, 7 & 8, Carbon County, Utah

Dear Ms. Beville:

During the previous year, the Office of Surface Mining (OSM) and the Division of Oil, Gas and Mining (DOGM) have been in the process of evaluating the requirements of the Utah Coal Mining rules and the federal regulations regarding highwalls. This evaluation has been part of OSM's oversight process as required under 30 CFR 945, the Utah Cooperative Agreement between OSM and DOGM. This oversight objective has been continued for the 1997 evaluation year as well. Various sites in Utah are now approaching the reclamation phase and an important determination that must be made during Phase I bond release proceedings is whether all highwalls have been eliminated or retained according to Utah's rules.

As part of the evaluation, DOGM is required to produce an inventory of highwalls for each permitted mine in Utah. Enclosed is a Highwall Survey which requests a summary of information needed for the inventory. DOGM asks that this survey be completed and submitted to the Division no later than March 4, 1997, so that the information can be compiled and presented to OSM for review early in April, 1997 (refer to the enclosed November 26, 1996 memo).

Further information regarding the concerns of OSM regarding highwalls and an explanation of the changes in the highwall rules are enclosed as an appendix to this highwall survey.

The OSM/DOGM oversight team proposes to conduct evaluations of all highwalls and areas adjacent to highwalls in terms of overall reclamation success in meeting AOC requirements. After Utah has verified highwall and disturbed area creation dates, the team may also select a representative sample on which to conduct onsite evaluations.

Ongoing evaluation and continued review of highwalls and AOC requirements will help mines achieve more defendable reclamation plans and will give OSM and Utah an effective means for reviewing and approving reclamation work accomplished for bond release.

Thank you for your help in completing this survey. If you have any questions, please call Daron R. Haddock at 538-5325 or Randy Harden at 538-5285.

Sincerely,

Mary Ann Wright
Associate Director of Mining

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Enclosures
cc: Dennis Winterringer (OSM)
D. Haddock
R. Harden
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