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February 28, 1985

Mary Boucek
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Division of Oil, Gas, & Mining
355 West North Temple
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Salt Lake City, UT 84180-1203

RE: D.O.C. & T.D. Review
Gordon Creek #3 & #6 Mines
INA/007/017 #2
Carbon County, Utah

Dear Mary:

Enclosed are 8 copies of the Beaver Creek Coal Company response to the D.O.C. and Technical Deficiency Review on the Gordon Creek No. 3 and 6 Mines.

A checklist is provided for the location of the response to each of the review comments. The new sheets and maps are numbered and dated, and should simply replace corresponding pages and maps in the M.R.P..

If you have any questions or need any further information, please let me know.

Respectfully,

Dan W. Guy
Manager of Permitting and Compliance

DWG/sb

Enclosures

cc: J.A. Herickhoff (BCCC) (without attachments)
File 4-P-7-1-1 (without attachments)
IBM-D1

DETERMINATION OF COMPLETENESS

Beaver Creek Coal Company
Gordon Creek #3 & #6 Mines
ACT/007/017, Carbon County, Utah

August 28, 1984

UMC 783.19 Vegetation Information

RESPONSE LOCATION

DETERMINATION OF COMPLETENESS

Sec. 3.4.5.3 (p. 3-25)

For reference areas, productivity measurements are not critical until the time of comparison with the revegetated areas and do not need to meet statistical adequacy until that time. However, a statement of productivity (preferably a letter from the Soil Conservation Service) should be supplied. If the reference areas are not in fair condition or better, describe management practices (i.e., fencing) that will be employed so that they are in fair or better condition when comparisons are made with the reference areas.

UMC 783.24 Maps: General Requirements

Sec. 3.2.10 (p. 3-7); Fig. 4-1 (p. 4-23); Table 4-1 (pp. 4-3, 4-4, 4-5)

DETERMINATION OF COMPLETENESS

(h) The coal haul road and access road are located within the permit area. This area surface ownership is indicated to be Carbon County and the State of Utah. If these roads are county roads, they would be considered public roads in or within 100 feet of the proposed permit area. Please elaborate and indicate as such.

UMC 784.13 Reclamation Plan: General Requirements

Sec. 3.4.5 (p. 3-22a); Sec. 3.5.4.5 (p. 3-36); Plate 3-1A; Figs. 3-7, 3-8, 3-9.

DETERMINATION OF COMPLETENESS

(b)(5) The applicant must supply complete and detailed information for the establishment of the riparian area. Include the seed mixture, number, species and arrangement of shrubs to be planted, plans for protection and standards to be used to determine revegetation success. It should be noted that Beaver Creek Coal Company (BCCC) must maximize the reestablishment of as much riparian area as possible, as per commitments made in the Gordon Creek #2/#7 Mining and Reclamation Plan (MRP).

Two additional vegetation communities have been disturbed (oak shrubland and sagebrush-grassland). Present a more detailed discussion of plans for revegetation of these areas and include a map showing the location of each type. Also present plans for reclamation and revegetation to narrow the haul road.

Sec. 3.5.5 (p. 3-36d); Plate 3-1A.

Sec. 3.4.5 (p. 3-22a)

It is suggested that the approved seed mixtures and revegetation methods for Gordon Creek #2 Mine be used on at least a portion of the reclaimed area. This will provide a test of the feasibility of the revegetation plan for Gordon Creek #2.

Sec. 3.5.4.5 (p. 3-36)

Several introduced species are proposed in the Gordon Creek #3 and #6 seed mixture. Justification for their use in accordance with UMC 817.112 must be provided.

Sec. 6.5.1 (p. 6-6)

(8) Provide the method and a commitment to plug exploration boreholes.

UMC 784.14 Reclamation Plan: Hydrologic Balance

DETERMINATION OF COMPLETENESS

Sec. 3.4.3 (p. 3-19); Appendix L

The water rights of present users (e.g., water right owners) are not ascertained in the application. The MRP should contain an inventory of existing water rights within the permit area and downstream to the confluence of the Coal Canyon drainage with the North Fork of Gordon Creek.

Fig. 3-3a (p. 3-19a)

Additionally, the MRP should document that a water right exists for the proposed permanent ponds.

Sec. 3.5.4.3 (p. 3-35)

(a) On page 3-35 of the MRP "erosion controls (straw dikes, etc.)" are proposed. The reference to "straw dikes, etc." is not definitive. The specific measures which will be used must be spelled out. This should include locations as well as installation and maintenance procedures.

Sec. 3.5.5.3 (p. 3-37)

Similarly, on page 3-37 of the MRP, the stabilization techniques for steep slopes are not specific in that "other stabilization techniques" are not defined. The exact measures to be undertaken must be defined.

Sec. 3.5.4.3 (p. 3-35); Plate 3-1A

(b) The postmining (reclaimed) drainage pattern is not adequately delineated. Page 3-35 of the MRP (Section 3.5.4.3) indicates water will flow down "channels to be reconstructed." These channels must be shown.

Plates 3-1A & 7-2.

Plate 7-2 does not adequately depict the sediment and drainage control plan. A map of approximately 1" = 50' scale (such as Plate 3-1A) should be included in the MRP to depict the specific postmining drainage. This map must show all channels, riprapping, straw bale dikes and any other structures to be used.

The water monitoring plan should be corrected to reflect that Station 3-3-W is not accessible anymore (see Figure 7-5, page 7-34, MRP).

Sec. 7.1.8 (p. 7-19); Fig. 7-5 (p. 7-3
Fig. 7-6 (p. 7-35); Plate 7-1

TABLE 7-2

No baseline water quality data are contained in the MRP. A summary of historical surface and ground water data to establish a baseline to assess vegetation practices must be added to the MRP.

UMC 784.15 Reclamation Plan: Postmining Land-Use

SEC. 4.5 (p. 4-32); Fig. 4-4 (p. 4-33); Fig 4-5 (p. 4-34); List of Figures (p. xiv)

DETERMINATION OF COMPLETENESS

A more detailed plan which discusses postmining land-use must be provided. Where a land use different from premining land-use is to be implemented, all requirements under UMC 817.133 must be addressed. Include a letter from the landowner which authorizes the proposed use of the land after reclamation.

UMC 784.16 Reclamation Plan: Ponds, Impoundments, Banks, Dams and Embankments

DETERMINATION OF COMPLETENESS

(a)(1)(ii) Each general plan shall contain a description, map and cross-section of the structure and its location.

PLATE 7-2

1. Plate 7.2 does not show a large enough scale to discern adequate drainage areas, etc., whereas areas could be more accurately depicted on Plate 7-1 or a plate of similar scale.

PLATE 7-4

2. The cross-section of the stock ponds in Figure 7-2 does not show enough detail to accurately determine water volume storage and sediment volume storage, as well as spillway elevations, etc. A surveyed cross-section of the two stock ponds should be supplied, stamped by a registered professional engineer. The detail should be sufficient to show embankment slopes and pond volumes.

TABLE 7-6 (p. 7-31)

(a)(1)(iii) What are expected velocities associated with the 100-year, 24-hour storm event? The applicant should demonstrate why it wouldn't be feasible to have a bypass channel which would allow flow to bypass these structures during extreme events.

SEC. 7.2.3.2 (p. 7-32); PLATE 7-

(a)(2)(iii) The operation and maintenance of the sediment ponds will be inspected regularly. What is meant by regular? Cleaning of the ponds will be carried out when they reach what sediment level? This level should be shown on the requested cross-sectional drawing submitted for the permanent impoundments.

(b)(1) See UMC 817.46 and 817.49 for specific comments.

UMC 784.18 Relocation or Use of Public Roads

Table 4-1 (pp. 4-3, 4-4, 4-5); Fig. 4-1 (p. 4-23); Sec. 3.2.10 (p. 3-7)

DETERMINATION OF COMPLETENESS

The mine roads are on county property (surface ownership). Please discuss this section relative to this fact.

UMC 784.19 Underground Development Waste

Sec. 3.3.2.6 (p. 3-12).

DETERMINATION OF COMPLETENESS

Provide information as to the location and method of disposal of underground development waste and excess spoil generated at surface areas.

UMC 784.22 Diversions

Plate 7-3

DETERMINATION OF COMPLETENESS

Page 7-25 of the MRP (last paragraph) refers the reader to Plate 7-3 for information on the bypass channel. Plate 7-3 could not be located. This discrepancy must be cleared up.

Plate 3-1A

Table 7-6 (page 7-31) of the MRP provides design specifications for the overflow channel. Reaches 3 and 4 are not shown on Plate 3-1A. Please identify reaches R-3 and R-4 on Plate 3-1A.

UMC 784.23 Operation Plan: Maps and Plans

Plate 7-2

DETERMINATION OF COMPLETENESS

A map is required that delineates each area for which a performance bond or other equivalent guarantee will be posted.

TECHNICAL DEFICIENCIES

UMC 817.15 Casing and Sealing of Underground Openings: Permanent

DEFICIENCIES

Sec. 3.5.3.1 (p. 3-32); Plate 3-2; Fig. 3-4a.

The MRP does not adequately address potential mine water drainage from backfilled portals. The application must include maps and/or diagrams showing the backfilled portals, location and rates of inflow encountered during mining and projected extent of abandoned mine flooding. Moreover, the applicant must submit an analysis that describes the anticipated hydrologic head development in abandoned workings and demonstrates future conditions will not result in drainage from portals and thus, require hydrologic seal installation.

UMC 817.22 Topsoil Substitute

DEFICIENCIES

Sec. 8.5 (p. 8-18).

The applicant must take additional samples of the proposed topsoil substitute. The samples must be taken to the depth that the soil will be removed and chemical and physical analyses conducted. The results of the analyses must be submitted to the Division.

UMc 817.24 Topsoil Redistribution

DEFICIENCIES

Sec. 3.5.5.1 (p. 3-36).

The applicant states in the reclamation plan that "contaminated material" will be removed before redistribution of the topsoil substitute. An indication of what is meant by "contaminated material" is required.

UMC 817.42 Effluent Limitations

DEFICIENCIES

Plate 3-1A.

The applicant has mentioned the use of straw bales and gabion structures, but has not identified their locations. Therefore, these structures must be located by the applicant on the minesite map as well as a conceptual cross-section of both indicated in the plan.

Table 7-2; Appendix 2.

The applicant must also state what their NPDES monitoring requirements are and summarize what water quality and quantity data have been submitted to the Division to date. See UMC 784.14.

UMC 817.44 Hydrologic Balance: Stream Channel Diversions

DEFICIENCIES

The applicant's proposal to retain the 48 inch culvert which was utilized to divert the streamflow from Coal Canyon under the minesite pads and sediment ponds poses a problem as a permanent reclamation measure.

Given the finite life space of a metal culvert, failure and eventual collapse of the 48 inch culvert is certain. When the culvert collapses, the erosion potential for the stream channel could be quite severe, with significant downstream impacts. Sec. 7.2.3.2 Table 7-3 Plate 3-1

It is the Division's position that the 48 inch culvert must either be removed or filled with nonacid-forming and nontoxic material and then sealed. The channel length where the culvert resided must then be reestablished pursuant to UMC 817.44(c) and (d).

The MRP should include all design calculations and specifications for the reestablished stream channel. This must include certified cross-sections, normal depth and velocity calculations, specific riprap sizing calculations and filter blanket calculations to show if a blanket is required or not. The riprap sizing noted on page 7-31 as "clobble sized riprap" and "large riprap" is not specific or supported by calculations. The specific locations that riprap will be installed on the reclaimed area must be delineated. Sec. 7.2.3.2 Table 7-6 Sec. 7.2.3.2; Table 7-6 Plates 3-1A & 7-3.

On Plate 3-1A, it appears that the reestablished stream channel will have a steep drop off at the point where the channel enters the proposed ripparian/wildlife enhancement area. The measures which will be used to protect this portion of the channel from erosion and head cutting upstream must be delineated. Plates 3-1A & 7-3.

UMC 817.44(d)(3) requires reestablishing stream channels to approximate natural stream channel characteristics. The MRP should contain measurements of gradient, extent of stream meanders, patterns and frequency of riffle, pools and drops of the undisturbed stream channel sections above and below the minesite in order to design the reestablished stream channel.

UMC 817.45 Hydrologic Balance: Sediment Control Measures

Sec. 7.2.5 (p. 7-32); See also: 7.2.3.2

DEFICIENCIES

The applicant has adequately addressed the methodologies needed to control erosion of the site, but has not addressed it in any other definitive terms than it will be done where needed. The

Division feels the applicant should be more specific about a maintenance plan with an on-site inspection schedule and commitments to get the work done shortly thereafter. Please address this issue concerning erosion maintenance problems.

UMC 817.46 Hydrologic Balance: Sedimentation Ponds

PLATE 7-4.

The Division cannot adequately assess the cross-sections and plans submitted in the MRP (Figure 7-2) to determine accurate storage volumes and overflow capacities associated with the ponds. The applicant must provide this information.

TABLE 7-6 (p. 7-31)

The applicant also needs to provide expected velocities for the 100-year, 24-hour storm event and associated riprap sizing calculations for sediment pond outlets and inlets. The applicant needs to address the requirements of UMC 817.46, sections (e) through (u) more specifically, including all this information.

UMC 817.47 Discharge Structures

DEFICIENCIES

SEC. 7.2.3.2 (p. 7-24).

The information regarding the spillway inlets and outlets does not contain supporting calculations with expected velocities, and supporting calculations for riprap and filter blanket installation. This must be addressed to adequately assess these discharge structures.

UMC 817.49 Hydrologic Balance: Permanent and Temporary Impoundments

DEFICIENCIES

SEC. 7.2.3.2 (p. 7-22); PLATE

The applicant should address the requirements of UMC 817.49, Sections (a)(1), (2), (3), (4), (5), (6) and (7) which the Division feels the applicant has not done in Section 7.2.3.2. The Division feels the impoundments or sediment ponds referenced in Section 7.2.3.2 are not shown in enough detail.

Section (c), (d), (e) and (i) should be addressed as well.

UMC 817.52 Surface and Ground Water Monitoring

SEC. 7.2.6 (p. 7-33); FIG. 7-5 (p. 7-3

DEFICIENCIES

FIG. 7-6 (p. 7-35); PLATE 7-1

Near the point where the access road goes up to the #6 Mine site, the Coal Canyon stream channel forks. The Left Fork of the drainage needs to be included in the surface water sampling program to separate out the impacts of drainage from the #6 Mine site. A sampling point must be added to the surface water monitoring program to gather these data.

Sec. 7.2.6 (p. 7-33); Table 7-7 (p. 7-33a).

The chemical parameters which are proposed for the water monitoring program do not include all major cations and anions. The constituents in the Gordon Creek #2 plan, page 7-83, should be adopted and included in the Gordon Creek #3 and #6 MRP.

UMC 817.54 Water Rights Replacement

Sec. 3.4.8 (p. 3-19); Fig. 3-3a (p. 3-19a); Appendix

DEFICIENCIES

See the discussion under UMC 784.14 to address the requirements of this regulation.

UMC 817.101 Backfilling and Grading: General Requirements

Sec. 3.5.4.2 (p. 3-35); Figs. 3-4b & 3-4c; Plate 3-1A

DEFICIENCIES

The MRP does not adequately describe highwall reclamation.

The applicant must, through the use of diagrams, show the lateral and vertical extent of which each highwall will be reclaimed. For proposed partial reclamation of highwalls, the applicant must provide justification using criteria given under subsections (1), (8)(ii) and (8)(iii).

In addition, the applicant must include:

1. The method of safety factor calculation, derived safety factor values and angle of repose for highwall backfill.

2. The source and composition of highwall backfill.

UMC 817.103 Backfilling and Grading: Covering of Coal and Acid- and Toxic-forming Materials

Sec. 3.5.5.1 (p. 3-36).

DEFICIENCIES

The applicant must address this section. No mention of the presence or absence of these materials was made.

UMC 817.156 Roads: Class I: Restoration

Sec. 3.2.10 (p. 3-7); Fig. 4-1 (p. 4-2)

DEFICIENCIES

The coal haul road is located on county-owned land. There is no documentation in the MRP as to the use of the landowner after mining. Simply stating that the road will remain is not enough. Therefore, each of the items in Section UMC 817.156 must be addressed.

It is not clear whether or not the access road may have had coal transported on it. Once again, the surface ownership is Carbon County and the landowner use after mining is not documented. Depending upon whether or not it is a Class I or a Class II road, the applicable restoration regulations must be applied.

UMC 817.181 Support Facilities and Utility Installations

DEFICIENCIES

Sec. 3.2.3 (p. 3-4).

The explanation of the substation and its reclamation must be described in terms of how it will prevent damage to fish, wildlife and relative environmental values as well as the prevention of additional contributions of suspended solids to the streamflow.

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LIST OF TABLES

LIST OF TABLES (continued)

LIST OF TABLES (continued) Page

3.2.2 Portals (continued)

The portals consist of steel ("I" beam) structures extending 50' to 100' underground and are maintained to provide clear, safe access to the mines. Upon final abandonment of the mine, the structures will be removed, the portals sealed and the coal outcrop covered as described in the Reclamation Plan, Section 3.5.3.1.

3.2.3 Surface Buildings and Structures

All surface buildings and structures are shown on Plate 3-1, the Surface Facilities Map. These are all existing facilities and there are presently no plans for additional structures or facilities.

Upon termination of operations, all structures will be removed and the areas reclaimed as outlined in the Reclamation Plan, Section 3.5.3.

Following is a list of major buildings and structures associated with this operation:

(a) Portals - three portals are in place at the No. 3 ans No. 6 Mine. See 3.2.2 for details.

(b) Fan - At No. 3 Mine (9' diameter) Jeffery fan exhausts mine air at 90,625 cfm. At No. 6 Mine a 5' diameter srendrup exhausts mine air at 45,000 cfm.

3.2.3 Surface Buildings and Structures (continued)

(m) Sedimentation Ponds - Three filtering ponds in series are located just below the disturbed area of operations. Runoff from all disturbed areas is directed to and cleanout within these ponds. Mine water is also cleaned within these ponds.

3.2.4 Coal Handling

Coal is brought out of No. 3 Mine on a 36" belt and discharged into a 10,000 ton capacity storage pile on the lower pad. Coal from No. 6 Mine is brought out on a 36" belt and discharged into a 20,000 ton (gravity storage pile) located on the upper pad. From both piles coal is then loaded into 40 ton trucks by a front-end loader and hauled to the preparation plant.

3.2.5 Power System

Power is supplied by the Utah Power and Light Company. The main transmission lines are 46 KV and feed into a sub-station below the mine yard. From the lower sub-station, a 4160 volt line feeds a smaller sub-station at the No. 3 Mine portal. This sub-station feeds 4160 volts to a 10,000 watt transformer underground in both No. 3 and No. 6 Mines and 480 volts to the mine yard.

3.2.6 Water Supply

Water for the bath house is hauled in by truck and placed in a 6,000 gallon tank. Mine operations water is taken from sumps within the No. 3 Mine and pumped to the faces and also was pumped through a drill hole to No. 6 Mine.

3.3.5.1 Signs

Specifications

All signs will be of a standard design that can be seen and read easily and will be made of a durable material (treated/painted wood or metal) and be supported by metal posts.

Identification Signs

Signs are placed as required at the mine area. Identification signs will be placed at the entrance to the mine area. Signs will show name, business address and telephone number of Beaver Creek Coal Company and identification numbers of permits or other authorizations to operate. Signs will not be removed until after release of all bonds.

Blasting Signs

No surface blasting is employed at this site. If blasting is needed, proper signing would be placed at all entrances to areas in the permit area and from public roads or highways, stating: "Warning, Explosives in Use."

Topsoil Markers

No topsoil was saved from the original disturbance since it was done in 1975. If any further land is disturbed, topsoil will be saved and marked as such.

3.3.6.2 Operating Schedule - Days - Shifts

Production will be on a normal two shift basis, five days per week (approximately 240 days per year). A small crew will perform maintenance work and other non-production jobs on the third shift on the same schedule.

3.3.6.3 Operation Employment

No. 3 Mine presently has 50 salary and 27 hourly people on the payroll.

No. 6 Mine has no personnel. No future projection for either mine.

3.3.7 Mine Permit Area

The enclosed "Permit Area Map" Figure 1-2, shows thede-signated permit boundary.

3.3.7.1 Projected Mining by Year

The projected mining by year is shown on the Mine Development Plans, Plates 3-3 and 3-4.

3.3.7.2 Acreage and Delineation of Mine Permit Area

The total acreage contained within the Mine Permit Area is 640 acres. The area is delineated on the "Permit Area Map." Figure 1-2.

3.4.3.1 Projected Impacts of Mining on Hydrologic Balance

Mining operations at the Nos. 3 and 6 Mines are not expected to impact the surface or groundwater quality or quantity. There are no perennial surface water courses within the permit area. Also, the principal source of groundwater is the Star Point Sandstone which is below the coal seam being mined.

Coal Canyon Creek is an ephemeral stream which flows from north to south. At the point where the stream intercepts the disturbed area, the flow is diverted underneath the area of disturbance in a 48-inch culvert. In this manner impacts to the stream from the disturbed area will be minimized. all other flow from the disturbed area is diverted to the sedimentation ponds before discharge.

Mining operations will not affect ground water as the regional aquifer, the Star Point Sandstone, is below the coal seam. There are no springs or seeps within the permit area that would be subject to mining impacts. The ground water that has been encountered at the No. 3 Mine is most likely from perched water tables. This water is directed to the sedimentation ponds to meet the effluent limitations of the NPDES permit before it is discharged.

3.4.3.2 Control Measures to Mitigate Impacts and Monitoring Procedures

Beaver Creek Coal Company will continue to maintain the present sedimentation control structures to prevent contamination of the surface waters of Coal Canyon Creek during flow periods. Areas where vegetation was affected is currently being revegetated to minimize erosion from surface run-off. Groundwater that is encountered at No. 3 Mine during mining operations will be used for dust abatement in both the No. 3 and No. 6 Mines. Excess water will be treated in the sedimentation pond before discharge.

The on-going surface water monitoring program is used to determine any changes in water quality that can be attributed to mining operations at the No. 3 or No. 6 Mines. Should changes in water quality occur, the source of the problem will be identified and measures taken to correct any deficiencies in sedimentation control.

3.4.4 Preservation of Soil Resources and Projected Impacts of Mining on Soil Resources

Soils of the Gordon Creek No. 3 and No.6 Mines were mapped and analyzed in July 1980. At that time natural occurring soil bodies were distinguished from disturbed land fill.The purpose of the survey was two-fold; a) to identify soils and their stripping depths for salvaging suitable natural

3.4.6.1 Potential Impacts on Fish and Wildlife (continued)

Disturbance of furtive species results from the levels of noise and activity associated with an operational mine. Thus, most larger species of birds and mammals (including, for example, deer, carnivores and raptors) tend to avoid the mine site, at least during working hours. Most of these species are likely to move freely around the mine site on weekends and to quickly re-inhabit the area after decommissioning.

Three types of mortality potentially could result from the Gordon Creek Nos. 3 and 6 Mines: raptor electrocutions on unsafe power poles, mammal roadkills, and pollution of downstream areas via Gordon Creek tributaries. A raptor hazard survey conducted in 1980 suggests that present pole configurations on the site incorporate the latest in protective design features. Mitigation measures for roadkills, stream pollution and other potential impacts are discussed in Section 3.4.6.2.

3.4.6.2 Mitigation and Management Plans

The Gordon Creek Nos. 3 and 6 Mines are an existing operation. Therefore, mitigation and wildlife management measures have been designed to prevent additional impacts related to continued mining activities and to facilitate rapid return of the site to wildlife habitat after decommissioning.

3.4.6.2 Mitigation and Management Plans (continued)

The relatively small-scale habitat loss associated with the mining operation will be mitigated upon completion of the project by reclaiming the disturbed sites. The revegetation plant mix, designed by SCS personnel includes herbaceous and woody species that are adapted to onsite conditions and are of known value to wildlife for cover, forage, or both. Details of the reclamation plan are provided in Section 3.5.

Habitat loss associated with disruption or pollution of the tributary to North Fork Gordon Creek is controlled by a diversion system to keep upslope runoff away from the disturbed area, and a sediment ponds to prevent disturbed area runoff from increasing the sediment load of the stream. See Sections 3.2.8, 3.3.9, and 7.2.3 for details of the diversion/sediment pond measures, which are approved under a discharge permit.

Disturbance-related impacts are mitigated to a significant extent by Beaver Creek Coal Company policies preventing harassment or hunting of wildlife in the study area. These policies will continue throughout the operation of the mine. Further, "employee awareness" programs will specifically inform mine personnel of especially sensitive periods (e.g., the nesting season for raptors, fawning season for deer) or habitats (e.g., winter range, snake dens).

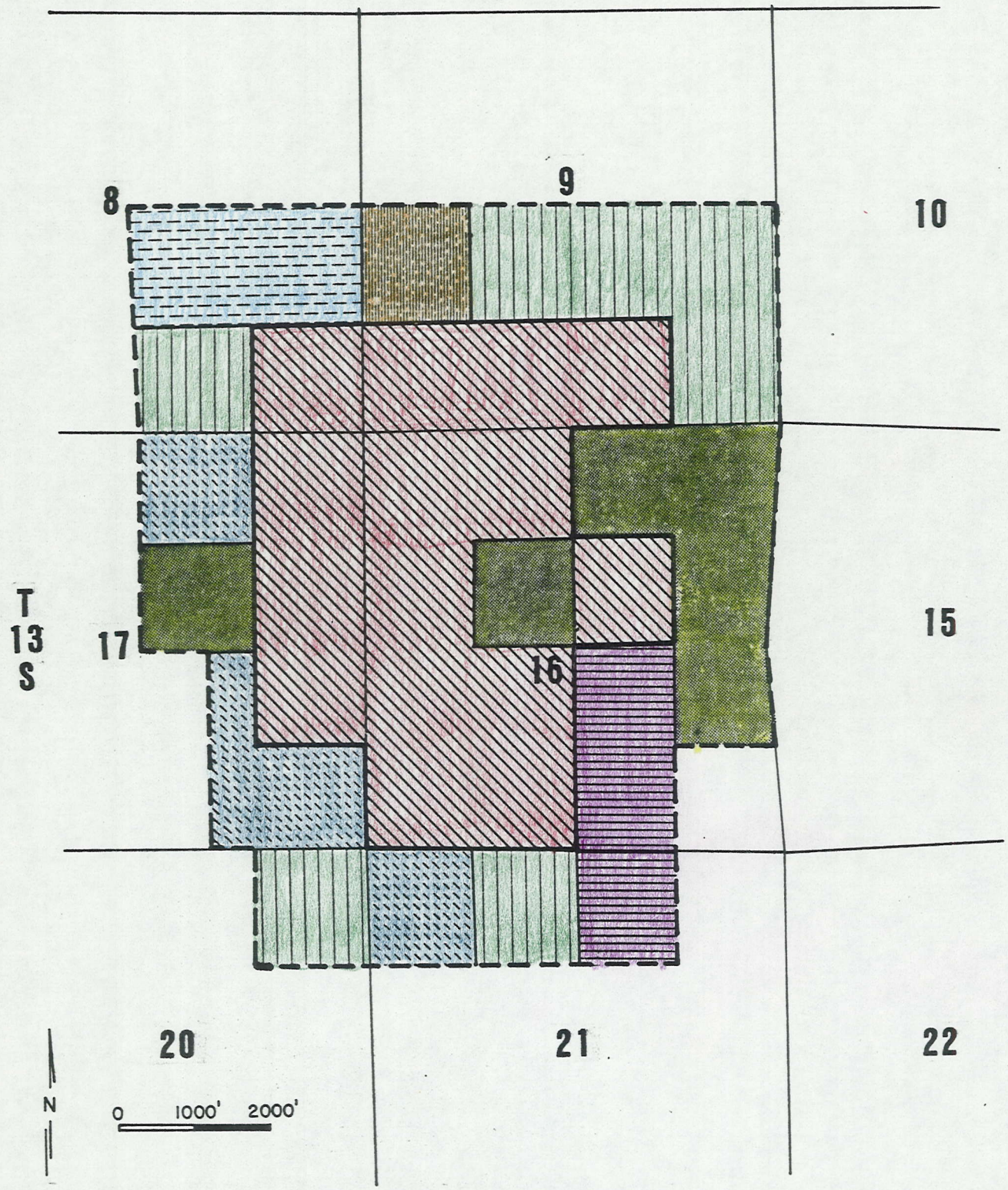
3.4.6.2 Mitigation and Management Plans (continued)

Roadkills, especially of larger species, are mitigated by an awareness program, speed limits and game crossing signs. Coal haulage drivers are asked to record any roadkills on a standard form. The Roadkill Report Form includes information such as date, time of day and location. Since this policy was instituted in 1980, no roadkills have been reported for the Gordon Creek Nos. 3 and 6 Mines access road.

Raptor electrocutions are minimized by using powerpole and line configurations known to avoid most types of conductor-conductor or conductor-ground contacts. Preliminary results of a raptor hazard investigation indicate that the Utah Power and Light lines to the Gordon Creek Nos. 3 and 6 Mines have incorporated safe design features.

The long-term management plan for the Gordon Creek Nos. 3 and 6 Mines permit area relies primarily on mitigation measures presently used for the mining operation and on reclamation and rehabilitation of disturbed sites when the project is completed. This approach is expected to keep adverse impact to a minimum and allow eventual return of the area to wildlife use.

GORDON CREEK #3 AND #6 MINES
SURFACE OWNERSHIP
FIGURE 4-1



4.5 Post-Mining Land Uses

The post-mining uses of the land will be the same as the pre-mining and present uses described above. Once mining has ceased, the disturbed areas will be reclaimed to a degree acceptable to the Division of Oil, Gas and Mining and the land will once again support its principle pre-mining uses: i.e., deer forage, hunting, sightseeing, watershed and hiking. Also private landowners will continue to graze sheep and cattle on areas near Beaver Creek, which is above the mine site.

The restoration of the area will be achieved by regrading the yards, reclaiming the roads and portal areas to a practical degree, planting all disturbed areas and monitoring the revegetation effort to the satisfaction of the Division of Oil, Gas and Mining.

4.6 Socioeconomic Considerations

The coal mining industry within Emery County has shown several erratic periods of renewed growth and sudden decline. During the 1950-1960 census period, the population of Emery County declined 8.79 percent. From 1960-1970, Emery County's population declined .74 percent per year. From 1970 to 1975, the population increased from 5,137 to an estimated 6,700 persons, a 23 percent increase.

Carbon and Emery Counties are economically dependent upon conditions in the coal market. This in evident by the slump in population of these counties that occurred between 1950-1970.

4.6 Socioeconomic Considerations (continued)

The recent increase in coal mining has centered on Emery County where mining employment has increased over 210 percent since 1969. The increase has been more modest in Carbon: 40 - 50 percent.

Most of the mine personnel reside at Helper, Huntington or Price. Of these three communities, Price is recognized as providing a variety of services and has made larger investments in facilities than the other two communities. However, recent economic growth in the area has decreased the potential for many communities to provide services to still more people unless additional investment in expansion and improvement of facilities is undertaken. It appears that these communities are currently improving and expanding the communities facilities. Obviously, as the economic base of Carbon and Emery Counties continues to rise, private business will encourage the development of more and better community services.

Surface Owner (s)	Mineral Owner (s)	Leasehold Interest	Royalty Interests	ROW-Easement & Miscellaneous
Carbon County, Utah (6)	ALL Carbon County, Utah(6)	COAL Beaver Creek Coal Company (2)	COAL Carbon County, Utah(6)	WATER Helen Marakis(17)

GRID CO-ORD. _____

Sec. 8 & 16 T 13S R 8E

Descr. 8: SE¼SE¼;

16: SW¼NE¼.

within permit area

Table 4-1 Surface and Mineral Land Status
(continued)

Surface Owner (s)	Mineral Owner (s)	Leasehold Interest	Royalty Interests	ROW-Easement & Miscellaneous
Carbon County, Utah (6)	ALL Carbon County, Utah (6)	COAL Beaver Creek Coal Company (2)	COAL Carbon County, Utah (6)	

GRID CO-ORD. _____

Sec. 9,16&17 T 13S R 8E

Descr. 9: S½SW¼, SW¼SE¼;

16: N½NW¼;

17: NE¼NE¼.

Within permit area

Surface Owner (s)	Mineral Owner (s)	Leasehold Interest	Royalty Interests	ROW-Easement & Miscellaneous
Carbon County, Utah(6)	COAL William Roger Skaggs(26) Margaret A. Skaggs (25) Frances Skaggs(24) LaFaye S. Fahl(9) MINERALS OTHER THAN COAL Carbon County, Utah (6)	COAL Beaver Creek Coal Company (2)	COAL William Roger Skaggs(26) Margaret A. Skaggs(25) Frances Skaggs(24) LaFaye S. Fahl (9)	

GRID CO-ORD. ____

Sec. 16 & 17 T. 13S R. 8E

Descr. 16: SW¼, SW¼NW¼;
17: SE¼NE¼, NE¼SE¼;
Within permit area

STATE OF UTAH
NATURAL RESOURCES
Oil, Gas & Mining

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

355 W. North Temple • 3 Triad Center • Suite 350 • Salt Lake City, UT 84180-1203 • 801-538-5340

February 20, 1985

Mr. Dan W. Guy, Manager
Permitting and Compliance
Beaver Creek Coal Company
P. O. Box 1378
Price, Utah 84501

Dear ~~Mr. Guy~~ Dan:

RE: Change in Status from ACT to INA, Beaver Creek Coal Company, Gordon Creek #3 and #5 Mine, INA/007/017, #2 and #7, Carbon County, Utah; Huntington #4 Mine, INA/015/004, #2 and #7, Emery County, Utah

This letter will serve to inform you of the change in activity status regarding the above referenced mines. These mines, which are no longer operating and face final reclamation upon approval of the mining and reclamation plans under review, are now regarded by the Division as Inactive and will henceforth be identified in future correspondence as INA/007/017 (Gordon Creek #3 and #6) and INA/015/004 (Huntington #4).

As you are aware, Beaver Creek Coal Company will continue to be held accountable for compliance with all applicable performnace standards until reclamation is completed and bond release has been obtained.

Should you have any questions, please contact the Division at your convenience.

Sincerely,

Mary M. Boucek

Mary M. Boucek
Permit Supervisor/
Reclamation Biologist

btb
cc: Robert Hagen
Allen Klein
Mary Boucek
Joe Helfrich
Tom Munson
Rick Smith
Tom Wright
8813R-37

STATE OF UTAH
NATURAL RESOURCES
Oil, Gas & Mining

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

355 W. North Temple • 3 Triad Center • Suite 350 • Salt Lake City, UT 84180-1203 • 801-538-5340

February 20, 1985

TO: Ronald W. Daniels, Associate Director for Mining

FROM: Mary M. Boucek, Permit Supervisor/Reclamation Biologist

RE: Change in Status from ACT to INA, Beaver Creek Coal Company, Gordon Creek #3 and #5 Mine, ACT(INA)/007/017, #2 and #7, Carbon County, Utah and Huntington #4 Mine, ACT(INA)/015/004, #2 and #7, Emery County, Utah

After consultation with Joe Helfrich and Tom Wright of the Division's Inspection & Enforcement (I & E) section, the technical staff concurs with Beaver Creek Coal Company's (BCCC) recent request to change the status of the above referenced mines from Active (ACT) to Inactive (INA). This action will facilitate the demands on workload of the I & E section and will not affect the technical permitting of these operations. Neither mine is or will be operating and both are facing final reclamation as soon as permanent program permits are obtained.

After speaking with the technical staff and I & E, it is apparent that the Division should formulate a policy regarding frequency of inspections once reclamation has commenced and subsequent activity on-site ensues. This is regarded as a critical time to ensure, from both technical and enforcement standpoints, that on-the-ground compliance with approved plans is being maintained.

btb
cc: Steve Cox
Pam Grubaugh-Littig
Joe Helfrich
Ev Hooper
Tom Munson
Rick Smith
John Whitehead
Tom Wright
8834R-40

FILE ACT/007/017 (INA) #27

Beaver Creek Coal Company
P.O. Box 1378
Price, Utah 84501
Telephone 801 637-5050

cc Rick

RECEIVED
JAN 31 1985
DIVISION OF OIL GAS & MINING

January 29, 1985

Mr. Ronald Daniels,
Deputy Director
Utah Division of Oil, Gas, & Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, UT 84180-1203

RE: Beaver Creek Coal Company
Gordon Creek No. 3/6 Mines
Cessation of Operations
ACT/007/017

Dear Mr. Daniels:

This letter is a request to change the status of the Gordon Creek #3/6 Mines from active to inactive. This request is being made in accordance with U.M.C. 817.131; notice of intent to cease operations was provided in earlier correspondence to Mr. Jim Smith.

The mine site will remain inactive until final reclamation begins in accordance with the pending M.R.P. approval. In the interim, all sediment and draingage controls and monitoring will remain as approved under the interim program approval. All other requirements of U.M.C. 817 will be met during the inactive period at this operation. The portals have been sealed and backfilled as required, and most of the surface facilities have been removed from the site. The number of surface acres affected by this operation are 640 acres, with 7.98 acres considered disturbed.

If you have any questions, or need any further information, please let me know.

Respectfully,

Dan W. Guy
Manager of Permitting and Compliance

DWG/sb

cc: Mary Boucek (D.O.G.M.)
Joe Helfrich (D.O.G.M.)
File: 4-P-7-1-1
IBM: D1