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State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

Norman H. Bangerter

Governor

Dee C. Hansen

Executive Director

Dianne R. Nielson, Ph.D.

Division Director

355 West North Temple

3 Triad Center, Suite 350

Salt Lake City, Utah 84180-1203

801-538-5340

November 29, 1988

Mr. Mike Glasson
Andalex Resources, Inc.
P.O. Box 902
Price, Utah 84501

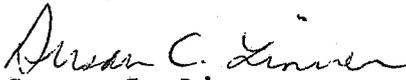
Dear Mr. Glasson:

Re: Roof and Floor Material Acid- or Toxic-Forming Potential
Determination, Andalex Resources, Inc., Centennial Project,
ACT/007/019, Folder #2, Carbon County, Utah

The Division has completed its review of the submitted Roof and Floor analysis of the Gilson seam, Aberdeen seam and Lower Sunnyside seam, which is in response to comments directed under UMC 817.48. The submittal cannot be considered technically adequate at this time. Further investigation of the roof and floor materials available concentration levels of Selenium and Boron are required. Please review the attached Technical Review Memorandum for further details.

Please don't hesitate to contact me or James Leatherwood for further discussion or clarification.

Sincerely,


Susan C. Linner
Reclamation Biologist/
Permit Supervisor

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Attachment
cc: D. Darby
BT45/105



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November 25, 1988

TO: Susan Linner, Permit Supervisor

FROM: James Leatherwood, Reclamation Soils Specialist *JL*

RE: Roof and Floor Material Acid- or Toxic Forming Potential, Andalex Resources, ACT/007/019, Folder #2, Carbon County, Utah

SUMMARY

The analysis, received November 14, 1988, of the roof and floor materials from the Gilson seam, Aberdeen seam, and Lower Sunnyside seam has been reviewed. As reported, the results indicate a high, potentially toxic, levels of boron and selenium. This determination is based on the unacceptable levels documented in Table 2 of the Guidelines for Management of Topsoil and Overburden for Underground and Surface Coal Mining. However, it is evident that these values probably represent "total" values and not the requested available levels. Table 6 of the Guidelines outline suggested methods of analysis for available boron and selenium. The roof and floor materials must be sampled and re-analyzed for available boron and selenium.

The total nitrogen and nitrate-nitrogen values do not indicate any potential nitrogen related waste quality problems.

RECOMMENDATION

UMC 817.48 Hydrologic Balance: Acid-Forming and Toxic-Forming Materials - JSL

Roof and floor materials must be re-sampled and analyzed to determine the levels of available boron and selenium.

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cc: D. Darby

BT51/33