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File ACT/007/019 #2

ANDALEX
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Tower Division

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April 17, 1989

Dr. Dianne Nielson
Director
State of Utah
Department of Natural Resources
Division of Oil, Gas, and Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

RECEIVED
APR 19 1989
DIVISION OF
OIL, GAS & MINING

Attn.: Susan Linner

Re.: Mid-Permit Term

Dear Dr. Nielson:

Enclosed are two copies of Andalex's response to the Division's comments regarding the Centennial Mine Mid-Permit Review. Some of the comments, particularly those relating to the Aberdeen Mine, will be more adequately addressed at such time as the "as-built" drawings have been completed. We expect to have these finished within one month. Some of the comments did not require a response as it was indicated that the information previously submitted is adequate. These comments will not be addressed specifically. Regarding the other comments:

783.16 Surface Water Information

Summaries of the water quality data up through 4th quarter, 1988, now appear in Appendix L.

783.25 Cross-Sections, Maps, and Plans

The location depicted on the drawings for non-coal waste is accurate. This is the location of our dumpsters used for general trash and scrap iron. The area depicted just to the north of the Apex Mine is now designated as temporary storage for excess spoil and development waste. As has been demonstrated in the past, Andalex does not anticipate the generation of very large quantities (Pond B, and only Pond B, has been cleaned once since mining began in 1980). Therefore, adequate room is available

for temporary storage. Based on accumulations thus far, we feel that at the most, we may produce as much as 3,000 cubic yards. This number is somewhat conservative and therefore, there is more than adequate area. As far as the permanent location is concerned, Andalex now shows on the appropriate drawings that the various highwalls in the vicinity of the mine portals can be used as backfill areas for the disposal of this material. It has been tested already once and determined to be non-acid forming and non-toxic. We will follow the suggestions outlined under 817.71 regarding permanent disposal.

1. Plate 14 was certified on 10-10-88.

2. Plate 17 now includes the extent of the reclamation to be included during Phase II.

784.13 Reclamation Plan: General Requirements

In an effort to demonstrate what is planned for highwall reclamation, we have included more detail on the backfilling of the highwall areas.

The original cut and fill drawings were modified and, accordingly the volume calculations, to show what will occur in the steeper areas. Some of the highwalls for example, will not be completely filled back in resulting in somewhat shallower slopes near the canyon bottoms. The highwall drawing for the Aberdeen Mine will be updated when construction is complete and as-builts can be done. The final calculations can be done at that time.

Andalex has committed to stability studies as required and we have used the means cost data to re-estimate the earthwork.

817.43 Hydrologic Balance: Diversions & Conveyance of Overland Flows

Tables IV-3, IV-3A, and Plate 8 have been modified accordingly to assure compliance.

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817.44 Hydrologic Balance: Stream Channel Diversions

Table IV-6 has been modified to correctly depict the restored stream channel calculations.

Tables IV-7 and IV-10 have been modified accordingly to depict correct rip-rap designs for restored channels.

817.46 Hydrologic Balance: Sedimentation Ponds

Pond E

Plate 8 has been revised.

Appendix O has been corrected. Revised numbers represent the corrected formulas.

Section 2.7-2 and Figure IV-6 have been revised pertaining to dimensions and rip-rap.

Pond E - PM

Section 2.6-1 is now correct.

Section 2.6-3 has been modified accordingly regarding spillways.

Pond C

Plate 12 has been corrected and Section 2.5 has been modified. A stage capacity curve for the pond is included. Also refer to Section 2.7-2.

817.46 Hydrologic Balance: Sedimentation Ponds

Within 30 days of pond completion, Andalex will supply certified as-built drawings.

817.55 Hydrologic Balance: Discharge of Water Into and Underground Mine

Section 2.18 has been revised accordingly regarding acreage discrepancies.

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817.71 Disposal of Excess Spoil and Underground Development Waste

This section has been clarified with respect to waste disposal. We have included information in the drawings and text which address the different storage areas, which each is used for including volumes. We have addressed disposal of potential acid/toxic-forming materials. We have discussed the permanent placement of non-toxic fill into highwalls upon final reclamation.

817.89 Disposal of Non-Coal Wastes

The entire heading of Non-Coal Waste has been rewritten to clarify this on-going misinterpretation. We have addressed non-coal waste including special items such as liquids including oil and grease.

817.101 Backfilling & Grading: General Requirements

We have addressed concern over backfilling especially as it pertains to excess fill generated during the mine operation. We have discussed areas of potentially steep slopes and have committed to perform studies necessary to document stability.

Again, as-built drawings will be submitted in the near future. Information to be included or replaced in Appendix O has been identified.

Please call me when you have generated any questions.

Thank you.

Respectfully submitted,

Michael W. Glasson
Senior Geologist

MWG/as

cc: File