



State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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July 19, 1989

TO: Susan C. Linner, Permit Supervisor

FROM: James S. Leatherwood, Reclamation Soils Specialist *JS*

RE: Stipulation Response, Andalex Resources, Inc., Centennial Project, ACT/007/019, Folder #2, Carbon County, Utah

SUMMARY

The response to stipulation UMC 817.48-(1)-JSL, received July 10, 1989, has been reviewed. The response does not adequately address the conditions of the stipulation. The following Analysis outlines specific concerns.

ANALYSIS

Stipulation UMC 817.48-(1)-JSL

The stipulation response commits to analyze roof and floor materials in all three coal mines. The response does not commit to sample and analyze the mid-seam nor does the response define the sample timing, specific parameters, or methodology of analysis. The plan must commit to monitor for acid- or toxic-forming material according to the Table 6 of the Utah Division of Oil, Gas and Mining's "Guidelines for Management of Topsoil and Overburden for Surface and Underground Mines". In addition, the plan must commit to conduct monitoring on an annual basis or more, if the general location of the mining operations change and this change results in a modification to the quality of the roof, floor or mid-seam.

RECOMMENDATION

The stipulation response cannot be approved until the above stated concerns have been completely and adequately addressed.

cc: D. Darby
BT51/96