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

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December 19, 1997

Denise Dragoo, Resident Agent
Van Cott, Bagley, Cornwall, & McCarthy
50 South Main Street, Suite 1600
Salt Lake City, Utah 84111-1495

Re: NOV N97-45-1-1 Abatement Plans, Horizon Coal Company, Horizon Mine,
ACT/007/020-97F, File #2, Carbon County, Utah

Dear Ms. Dragoo:

The referenced amendment has been review by Bob Davidson, Reclamation Specialist for the Division. His technical analysis is provided for your review. Please respond to the several deficiencies noted herein by January 15, 1998.

RECLAMATION PLAN

TOPSOIL AND SUBSOIL

Regulatory Reference: 30 CFR Sec. 817.22; R645-301-240.

Analysis:

The reclamation portion of the culvert extension amendment contains the following items that are either discussed or still need additional corrections:

- Soil Redistribution
- Reclamation Updates Needed

Soil Redistribution

Section 8.8, Plans for Redistribution of Soils, and Plate B Appendix 8-1, contain information for soil redistribution. This information has been updated as impacted from the 1997 activities of importing topsoil and distributing topsoil from the disturbed stockpile during the crushed culvert repair. During final reclamation, topsoil placement thickness will be 23 inches. The thickness of topsoil placement is calculated from the total available topsoil divided by the total area to receive topsoil. Plate B, Appendix 8-1, shows all reclamation areas that will receive

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topsoil. As shown, not all of the surface within surface disturbance area boundary is disturbed and, therefore, only 4.75 acres of the 9.15 acres of disturbance will actually receive topsoil.

Reclamation Updates Needed

The unapproved reclamation activities (N97-45-1-1) have altered the approved Mine Reclamation Plan by changing calculated final reclamation fills thereby invalidating portions of the approved reclamation plan. Amendment 97F needs to address the following:

- Describe in detail how reclamation will be achieved to reestablish both drainage areas in Jewkes Creek and Portal Canyon.
- Discuss the precise removal and ultimate placement of construction fills during reclamation.
- Provide plates showing revised reclamation contours and cross sections.

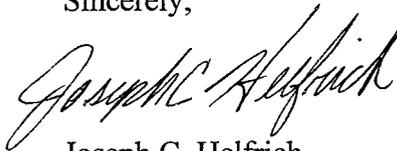
Findings:

The information provided does not meet the regulatory requirements of this section. Prior to approval, the permittee must provide the following in accordance with:

R645-300-142 and 143, R645-301-120, R645-301-500 and R645-301-600, The unapproved reclamation activities (N97-45-1-1) have altered the approved Mine Reclamation Plan by changing calculated final reclamation fills thereby invalidating portions of the approved reclamation plan. Amendment 97F needs to describe in detail how reclamation will be achieved to reestablish both drainage areas in Jewkes Creek and Portal Canyon, discuss the precise removal and ultimate placement of construction fills during reclamation, and provide plates showing revised reclamation contours and cross sections.

If you have any questions, please call.

Sincerely,



Joseph C. Helfrich
Permit Supervisor