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

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January 14, 1998

TO: File

THRU: Joe Helfrich, Permit Supervisor

FROM: Jess Kelley, Reclamation Specialist JK

RE: Deficiencies in UC-3 Culvert Extension Amendment Application, Horizon Coal Company, Horizon Mine, ACT/007/020-AM97D-1, Folder #2, Carbon County, Utah

SUMMARY:

The permittee first submitted this amendment for Division review during the summer of 1997. After protracted negotiation and discussion with the Division and a complete revision of site base maps, the permittee again submitted the amendment, in a modified form, on December 10, 1997. Division reviewers found the December 10 submittal to be so incomplete that Permit Supervisor Joe Helfrich instructed them to simply compile a list of its deficiencies. This memorandum contains this writer's list of deficiencies.

TECHNICAL ANALYSIS:

The following are deficiencies in the December 10 submittal which make it impossible for the Division to approve or even properly review that submittal.

1) The maps accompanying the submittal show only the present topography. They have not been revised to show the proposed topography of the culvert extension area. R645-301-521.150

2) The submittal contains no volume analysis for the proposed culvert extension area. It is thus impossible to determine how much fill material will be used to construct the extension or where that material will come from. R645-301-521.100

3) The submittal contains no topsoil stockpiling plan. It is thus impossible to determine how much topsoil and/or substitute topsoil will be displaced by the R645-301-231.400

construction of the culvert extension and where that material will be stockpiled.

4) The submittal mentions a "100 feet x 50 feet [sic] portion of an adjacent hillside" that will be "disturbed" during the construction of the culvert extension. There is no hint, however, of where that hillside is or exactly what will be done to it. R645-301-521.162

5) The submittal contains no reclamation plan for the culvert extension area. The maps have not been revised to show the proposed final topography and there are no estimates of how much fill material will be required to construct that topography or where that material will come from. R645-301-541.400

6) The submittal contains no estimate of the cost of reclaiming the culvert extension area. There is some mention of the cost of removing the culvert itself, but there are no estimates of the costs associated with the necessary reclamation earthwork. R645-301-542.800

RECOMMENDATION:

The permittee must correct the deficiencies listed above before the Division can approve or even review the proposed amendment.

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