



OGMCOAL DNR &lt;ogmcoal@utah.gov&gt;

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**Fwd: Dog Hole Capping, As built Diagram, Horizon Mine Permit C/007/0020**

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**Steve Christensen** <stevechristensen@utah.gov>  
To: OGMCOAL DNR <ogmcoal@utah.gov>

Mon, Oct 26, 2015 at 3:40 PM

fyi- Horizon outgoing file.

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From: **Daron Haddock** <daronhaddock@utah.gov>  
Date: Fri, Oct 23, 2015 at 4:49 PM  
Subject: Re: Dog Hole Capping, As built Diagram, Horizon Mine Permit C/007/0020  
To: "Dragoo, Denise" <ddragoo@swlaw.com>  
Cc: Dana Dean <danadean@utah.gov>, "Christensen, Steve" <stevechristensen@utah.gov>, Alex Walker <awalkerlaw@aol.com>, "Rigby, Steven W." <swrigby@blm.gov>

Denise,

I have looked at the "as-built" diagram of the dog hole capping that you sent to us. Thank you for the diagram which is clear and describes the backfilling of the hole, however, I am concerned that the submittal does not satisfy the BLM's closure requirements. Please refer to the BLM letter dated September 24, 2015 which is attached. The "as-built diagram should be accompanied by a signed and notarized affidavit explaining the construction process, design, and materials used in the backfill. The letter also discusses the closure of the three other main portals. Again, it seems that we have a disconnect between what the BLM is expecting and your current mine closure plan. The BLM has indicated that at least 25 feet of backfill is required in front of the seals. Your plan only talks about 20 feet. The BLM has stated that at least one P-trap should be installed. Your plan does not discuss the installation of any P-traps. The BLM contemplates that there would be backfilling over the portals (to ensure 25 feet of backfill). Your plan states that backfill will only be to the mine opening.

I feel that it is important that we all understand what the sealing plan is for the mine. At this point, the plan is too vague and does not address the issues that were discussed in the September 14th meeting. Please provide a response that addresses these concerns. Thank You.

Regards. Daron Haddock

On Wed, Oct 21, 2015 at 4:27 PM, Dragoo, Denise &lt;ddragoo@swlaw.com&gt; wrote:

Dana, attached per your request is the "as built" diagram of the dog hole capping at the Horizon Mine.  
Thanks, Denise

Denise A. Dragoo

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Snell & Wilmer

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Daron R. Haddock

Coal Program Manager  
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**09282015.pdf**

140K

C/007/020 Incoming  
cc: Steve C.  
Amanda



# United States Department of the Interior



BUREAU OF LAND MANAGEMENT  
Green River District, Price Field Office  
125 South 600 West  
Price, UT 84501  
<http://www.blm.gov/ut/st/en/fo/price.html>

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DIV. OF OIL, GAS & MINING

In Reply Refer To:  
3400 (UTGO23)  
UTU-74804  
C/007/0020

Daron Haddock  
Utah Division of Oil, Gas, and Mining  
1594 West North Temple, Suite 1210  
Salt Lake City, Utah 84114-5801

**RE: Mine Portal Closure, Hidden Splendor Resources, Inc., Horizon Mine, C/007/0020**

Dear Mr. Haddock:

The Bureau of Land Management (BLM), Price Field Office (PFO) appreciates having the opportunity to meet with you and Mr. Walker, representative of Hidden Splendor Resources Inc., on September 14, 2015, to discuss the up-coming portal closures and reclamation goals for the Horizon Mine. During that meeting three items were discussed which need further clarification or confirmation. They are:

- 1) What were the closure methods and materials utilized when plugging the small air shaft located above and behind the main portals?
- 2) Should P-traps be installed in the Mitchell-Barrett type seals to help preserve the closure's integrity?
- 3) What design criteria is required by the BLM, the Mine Safety and Health Administrations (MSHA), and the Utah Division of Oil, Gas and Mining (UDOGM) for closing the three portals?

During the September 14<sup>th</sup> meeting it was agreed that Hidden Splendor Resources, Inc. would provide UDOGM, MSHA, and the BLM with as-built diagrams of the shaft's closure design with a signed and notarized affidavit explaining the construction process, design, and materials used in the backfill. After which, the agencies will consider its approval.

Concerning whether or not P-traps should be used, the PFO met with MSHA on September 17, 2015, to discuss the ramifications of such a design. After considering the pros and cons, the BLM and the MSHA recommends that at least one P-trap be used in the stratigraphically lowermost portal, portal 2. A steel pipe with a 6-inch minimum diameter P-trap should be

installed such that the trap is filled with propylene glycol or a similar non-toxic, non-freezing component, and the pipe extended to daylight so that water is not impounded behind the seals. The pipe will be covered by the backfill material and mapped for future purposes.

Regarding the closure of the three portals, numbered 1 to 3 and from left to right while looking at the mountainside, the BLM and the MSHA have concluded that portal 1 should have a Mitchell-Barrett type seal built in front of the existing wall and backfilled into the parking lot. The backfill needs to be at least 25-feet and will require additional material over the portals to compensate for the slope of the canyon. Portal 2 should also have a Mitchell-Barrett seal constructed in front of the Kennedy stopping and backfilled. Portal 3, which has a seal already, should have the out-by structure removed, backfilled, and contoured with the canyon.

The Mitchell-Barrett seals should be solid, concrete blocks wet-laid and plastered, with a pilaster for support. All entries would be back-filled with incombustible material from the seal location to a minimum of 25-feet to the outside surface. This design will require additional material be placed over the top of the exposed portal structures to ensure, with the slope of the material, there would be a minimum of 25-feet in front of the seals.

This is the BLM PFO's current understanding of the conversations and conclusions reached thus far for the Horizon Mine portal closures. We believe that these steps will ensure that the mineral resources will be protected and satisfy BLM's obligations in this regard. If we have missed some important feature or come to some erroneous conclusion, please let us know.

If you have any questions or comments please contact Steve Rigby at (435) 636-3604.

Sincerely,



Ahmed Mohsen  
Field Manager

cc: Alexander H. Walker, Resident Agent  
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