



# State of Utah

DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF OIL, GAS AND MINING

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June 7, 1989

Mr. William B. Prince  
HOLME, ROBERTS & OWEN  
Suite 900  
50 South Main Street  
Salt Lake City, UT 84144

Dear Mr. Prince:

RE: Reclamation Status, Blazon #1 Mine, INA/007/021, Folder #2,  
Carbon County, Utah

This letter addresses the reclamation as-built report received by the Division on January 18, 1989, the amended report dated May 10, 1989, the mitigation plan for portal slope erosion received May 17, 1989, supplemental information for the as-built report received May 18, 1989, outstanding stipulations to the permit, and the operator's request for bond release.

The Division is aware of your concerns regarding costs and timing of the remaining work to complete the reclamation at the Blazon Mine. However, several deficiencies remain in conjunction with the reclamation work accomplished to date. Extensive field modifications to the reclamation work accomplished have led to conflicts within the existing reclamation plan and further design requirements in the as-built report for Phase I reclamation. Further, changes to the plan have resulted in additional information which will be required in order to have a sufficient monitoring plan and Phase II and Phase III reclamation plan so that the site is inspectable throughout the operator liability period.

At your request, a list of remaining deficiencies found within the plan is provided in this letter. Portions of this list may have been partly addressed previously by the operator or may be in conflict with other sections of the plan. Due to the numerous changes in the plan, this list cannot be considered inclusive of all the work that NAE may have to accomplish with regard to the plan, site work, and requirements for bond release.

Once the following information has been submitted to the Division, additional deficiencies may be found within that information, or, the revised information may present conflicts within the plan which may have to be resolved. Should you have specific questions regarding those items listed, refer to the review memos which are attached to this letter, or if needed, contact the Division directly.

Deficiencies found within the plan include but are not limited to the following:

1. The Reclamation As-Built Drawings will have to be resubmitted to include the following information or details;
  - a. A scale of 1"-50' and a contour interval of 2 feet.
  - b. Revised disturbed area boundaries to incorporate all disturbed areas within the permit boundaries, including, road cuts, the access road from the property boundary to the site, the topsoil borrow area, and other areas within the site which have been disturbed as a result of the recent reclamation activities.
  - c. The location of the water well.
  - d. The location, extent and depth of the subsoil, substitute topsoil, and topsoil materials.
  - e. The location of alternate sediment control facilities including berms, straw bales, and silt fences.
  - f. The location and extent of small area exemptions, those areas which are disturbed but not reporting to the sediment pond.
  - g. The locations of vegetation transects and reference areas.
  - h. The test and sample locations used for soil cover and analysis.
  - i. The location, size and extent of hydraulic structures including culverts, ditches, swales, and sediment pond facilities.
  - j. Vegetation treatments.
  
2. To satisfy the requirements of Stipulation UMC 817.46 - (2) - MDD/RPS, a certification statement needs to be submitted in conjunction with the as-builts of the sediment pond. In accordance with UMC 817.46, the operator must also commit to quarterly inspections of the sediment pond throughout the liability period.

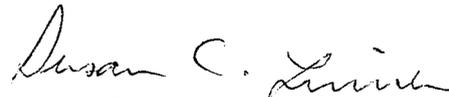
3. In accordance with Stipulation UMC 817.47 - (1) - RPS, July 6, 1988, the riprap sizing and requirements for the outlet of the 24" culvert from Little Snyder Drainage into Mud Creek was not presented in the as-built designs and needs to be addressed in the plan.
4. A revised plan and design for riprap inadequacies in Mud Creek.
5. Stipulation UMC 817.53 - (1) - MDD/RPS, conditions regarding the well are still outstanding.
6. The Mitigation Plan for the portal slope erosion must include a plan and methodology for replacement of cover and topsoil materials in accordance with the requirements of Stipulation UMC 817.24 - (1) - JSL, and Stipulation UMC 817.22 - (1) - JSL.
7. Stability analyses for portal pad slope and Little Snyder Drainage indicate deep seated stability but do not address the apparent shallow surface failure and creep associated with those slopes. The stability analyses for these slopes should be enhanced to allow for these problems and offer a method for monitoring and mitigating any further problems associated with these slopes.
8. Abatement of NOV #89-17-1-2.
9. A revised and complete revegetation plan, including timetable and implementation dates for the remaining revegetation work. Additionally, the plan must include a noxious weed control plan and a riparian monitoring plan.
10. The reclamation plan is outdated as a result of the numerous revisions, amendments and field changes to the site as a result of reclamation activities. The Reclamation Plan needs to be updated to reflect those changes. Of primary concern is the inspectability of the site with respect to the reclamation plan. A concise summary of all maintenance, monitoring and future reclamation activities should be incorporated into the reclamation plan, conflicting or erroneous information removed, and new information resulting from reports by ACZ and EarthFax referenced within the text of the Reclamation Plan. A minimum of two complete copies of the reclamation plan need to be submitted to the Division.

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11. In conjunction with the request for bond release, a draft policy on the requirements for bond release is included with this letter. A detailed cost estimate for remaining reclamation and monitoring, including a basis for the earthwork which was performed during Phase I reclamation will need to be supplied in conjunction with the request for bond release.

Due to the number of deficiencies found in the plan and the as-built reports, the operator should plan on meeting with the Division to determine a schedule of the work remaining in conjunction with the reclamation plan for the Blazon Mine. During that meeting further discussion of any technical or mine plan related issues can be held and appropriate technical representatives for NAE should be included in that meeting. Please contact me by June 14, 1989 to schedule a meeting.

Sincerely,



Susan C. Linner  
Reclamation Biologist/  
Permit Supervisor

c1  
cc: R. Harden  
BT16/64-67