



November 3, 1983

Mr. Dan Guy
Beaver Creek Coal Company
P. O. Box AU
Price, Utah 84501

RE: Determination of Completeness
and Technical Deficiency
Document
C. V. Spur Prep. Plant
ACT/007/022, Folder No. 2
Carbon County, Utah

Dear Mr. Guy:

The Division's technical staff has reviewed Beaver Creek Coal Company's C. V. Spur Determination of Completeness (DOC) and Technical Deficiency (TD) response document for completeness. A few areas were still found to be lacking information. These areas must be addressed before the plan can be determined complete and the Technical Analysis (TA) initiated. These deficiencies must be addressed and submitted to the Division by November 10, 1983.

The information still lacking includes the following:

UMC 783.19 Vegetation Information

1. Cover data from both the reference area and the affected area must be submitted.
2. Shrub density data from the affected area must be submitted.

All sampling should be done according to current Division vegetation guidelines (March 1982). If cover and shrub density differ significantly between the reference area and affected area, a new reference area will need to be located and sampled.

UMC 784.13 Reclamation Plan: General Requirements

- (b) This section was not changed in the ACR Response.

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The applicant must provide documentation substantiating the development of the unit costs presented in the bond estimates which have been developed for the disturbances within this permit term. This documentation should consist of identifying references used in the analysis and providing the background calculations that were made in the estimates.

Background calculations must be provided showing how the volumetrics were determined.

The final reclamation costs should be reflective of the rental rate blue book (the standard for construction costs). The unit costs for all of the equipment mentioned must be included. Each step for each type of reclaimed site identified in the reclamation plan must be addressed in detail. Such steps should include ripping, scarification, seedbed preparation, fertilization, transplanting, mulching, riprapping and any other steps the applicant cites in the reclamation plan. Please identify labor classifications and labor rates used to develop costs (i.e., equipment operator, common laborer, etc.) rather than a gross labor rate. The type of equipment proposed for the work must also be identified with the associated cost rate and a mobilization rate must be included.

An inflation rate for a five year period needs to be included.

The cost estimate stated that 110 acres would be seeded. On page 9-11a, it is stated that 117.1 acres will be disturbed. Please explain this discrepancy.

The type of bond to be submitted should be provided.

The applicant has not provided justification (per UMC 817.112) for introduced species on Table 3-3.

(Technical Note: The applicant should consider adding forbs and additional shrubs to the seed mix on Table 3-3 to assure that diversity requirements are met.)

UMC 784.14 Reclamation Plan: Protection of Hydrologic Balance

The information provided to further describe the operation of the french drains on the property needs some further clarification.

1. Page 7-56, Section 7.1.5 notes "The remaining portion of the french drain will continue to favor lowering of the water table. . . ." It is unclear which french drain is being referred to and what section of it will remain upon reclamation. Please clarify this.
2. The section of french drain to remain upon reclamation should be shown on Plate 3-7.

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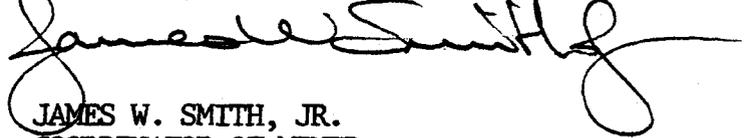
3. How will the french drain be rendered "non-discharging?"

UMC 784.16 Reclamation Plan: Ponds, Impoundments, Banks, Dams and Embankments

Page 10 of the Division's DOC document requested plans and cross-sections for the thickener and overflow ponds. No information was received on the plant overflow pond or the thickener pond (not to be confused with the thickener overflow pond). Please respond to this deficiency.

If you have any questions, please feel free to call me or Ev Hooper of my staff.

Sincerely,



JAMES W. SMITH, JR.
COORDINATOR OF MINED
LAND DEVELOPMENT

JWS/EH:btb