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Mountain Coal Company
Trail Mountain Mine
Post Office Box 1378
Price, Utah 84501
Telephone 801 637-5050 (Price Office)
801 637-5203 (Mine Office)
801 748-2140 (Mine Site)

April 13, 1992

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DIVISION OF OIL
GAS & MINING PRICE UTAH

Pamela Grubaugh-Littig
Permit Supervisor
Utah Division of Oil, Gas & Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

Re: Mid-Term Review
C.V. Spur Loadout Facility
ACT/007/022; #2
Carbon County, Utah

Dear Ms. Littig:

Enclosed are 8 copies of the Mountain Coal Company's response to the C.V. Spur Mid-Term Review Items. Also enclosed is a copy of the Mid-Term Review Item for use as a checklist. All pages and plates are numbered and should replace corresponding numbers in the P.A.P. upon approval.

Only the "Finding" items 1 through 7 are addressed with this submittal. "Proposal" items 8,9 and 10 will be submitted under a separate cover as proposed amendments.

If you have any questions, or need any further information, please let me know.

Respectfully,

Dan W. Guy
Manager Permitting/Compliance

cc: Dave Arnolds
Rick Parking
Johnny Coffey
File

These pages not inserted into plan

Midterm Review Items

Item 1 Finding See. 2.1, p. 2-1.

The narrative, maps and other documents in the PAP carry the name Beaver Creek Coal Company. The permit is in the name of Mountain Coal Company. A question exists now that the name change has been legally completed. How should this be reflected in the PAP?

Recommendation

Recommended the permittee amend "2.1 Scope, page 2-1, 5/10/91" which would clarify this matter short of changing each document carrying the name Beaver Creek Coal Company. Further that such an instrument be construed to meet the need for a name change on such administrative documents until: (1) permit renewal or (2) documents be changed for other reasons.

Item 2 Finding Not Changed in Plan.

Pages 3-40, 3-43, figures 3-8, and 3-11, depicting signs with Beaver Creek logo, do not have to be changed per item 1 above.

Recommendation

All signs at the preparation plant will have to carry the Mountain Coal Company name. Signs Changed on site.

Item 3 Finding

Sec. 3.2.5.1, p. 3-24a

Pages 3-24, 3-24a, 3.2.5.1 do not reflect roads have been classified. Plate 3-2.

Recommendation

Pages 3-24, 3-24a, 3.2.5.1 should be updated relative to roads to comply with R645-301-527.100-300. Plate 3-2 should be updated as necessary to comply with revisions required herein.

? Item 4 Finding

Requested info from Rollins, Brown & Gunnell – No response yet.

The geology map and other required information is not certified. Page 6-3, figures 6-2 through 6-13, and plate 6-1, provide core sample data, location of bore holes, and geologic map of the Price area, respectively. The foregoing documents have been prepared by professionals, but are not certified as required by R645-301-512.150. It should be recognized that most of the requirements under R645-301-622 are not applicable to a preparation plant.

Recommendation

The operator should take steps to certify the geology map and the bore holes and core samples documents, figures 6-2 through 6-13.

Item 5 Finding and Recommendation

Sec. 7.2.7, p. 7-94.

Page 7-94, 7.2.7, reconfirm cleanout levels for ponds 1, 2, and 3 (penciled note).

Note: This sheet is also submitted under Item 9 as a proposed amendment. That sheet, if approved, would replace the one for Item 5.

Item 6 Finding

Plate 7-1

Plate 7-1 map showing water monitoring stations is not certified. R645-512.140 requires Hydrology maps be certified.

Recommendation

Recommend the operator retitle above map as a hydrology map, add information as required in R645-301-722, and certify the map.

Item 7 Finding

Plates 3-2, 7-4b.

Plate 3-2 (received 12/23/91) does not correctly show recent pond modifications. For instance, Pond 6 is shown with a culvert outlet, whereas, the pond now has an open channel spillway.

Recommendation

Plate 3-2, along with other relevant maps, should be modified to show correct pond spillway configurations.

Item 8 Proposal

(To be submitted as amendment, at a later date.

Page 3-54a. The operator stated that some of the wells are showing consistent readings and would like to propose eliminating some of the wells. Five wells were eliminated in 1982.

Recommendation

The operator may submit a proposal as provided in R645-301-731.214 for Division consideration and action. Also refer to page 7-3, 7.1.2.2.

Item 9 Proposal (To be submitted as amendment.)

The operator stated he would like to place sediment markers in all C.V. Spur sediment ponds in lieu of performing surveys. He stated that with personnel changes, cutbacks, and moves, personnel at the loadout would assist with the compliance program by keeping track of sediment levels.

Recommendation

Same as Item 8 above.

Item 10 Proposal (To be submitted as amendment)

The operator proposes to leave small depressions as provided in the regulations on the refuse pile.

Recommendation

Same as Item 8 above.

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