



United States Department of the Interior

OFFICE OF SURFACE MINING

Reclamation and Enforcement

BROOKS TOWERS

1020 15TH STREET

DENVER, COLORADO 80202

OFFICE OF THE REGIONAL DIRECTOR

JAN 23 1981

Mr. James W. Smith Jr.
 Coordinator of Mined Land Development
 Division of Oil, Gas and Mining
 1588 West North Temple
 Salt Lake City, Utah 84116

Dear Jim:

In response to Mr. Dan Guy's (Beaver Creek Coal Company) letter of June 24, 1980, the Federal regulatory agencies have reviewed Beaver Creek's response to Special Stipulations No. 16 and 27 of the Huntington Canyon No. 4 Mine Plan approval. We have now received from the USGS (August 29, 1980) and the Forest Service (November 12, 1980) responses and wish to make known to you the deficiencies noted.

In the case of the subsidence monitoring plan, OSM requests that Beaver Creek Coal Company assess, and employ if determined feasible, a series of at least two lines of sign survey points across the surface over a future panel of the proposed mine. These points should be surveyed periodically to determine whether additional surveying is necessary. We suggest that such a series be planned (in consultation with OSM and the Forest Service) over one or more panels and rooms identified for potential subsidence. We request that Beaver Creek Coal Company propose one or more locations for such short-term monitoring no later than May 31, 1981. We also request clarification on the frequency of surface surveys. Beaver Creek Coal should also provide the procedures that will be used to determine the angle of draw and boundary coal that can be removed without causing subsidence, and the amount of subsidence that occurs with varying recovery rates. Another aid that would be useful would be a geologic map. Copies of all data and maps developed from the subsidence program must be submitted to the regulatory authorities.

With respect to the backfilling and grading plan, we find the general concept to be acceptable and the general nature of the postmining drainage system to be acceptable. However, the schematic for "Road and Portal Reclamation" is not acceptable. Beaver Creek Coal is requested to determine more precisely the amount of bench material available for backfilling the proposed highwall and is requested to more carefully analyze the geomorphic processes active along that highwall in order to prepare a design for backfilling and grading that completely backfills the highwall where such backfilling is projected to be stable, and excavates, or otherwise modifies, the existing highwall where such is necessary to achieve mass and hydrologic, stability. If all such calculations have been performed, please provide copies. It appears to us that the contours, even at the 1"-400' scale maps, have not been developed

from estimates of available material. We also note that the plan must specifically indicate that all coal exposures will be covered with at least four feet of non-combustible material. We request that these analyses be submitted no later than May 31, 1980.

We have also reviewed your submittal of August 1980, in regard to Special Stipulation No. 10 (Soil Inventory). The soils information supplied in the report is sufficient to answer stipulation #10 as far as the survey is concerned. However, this information must now be incorporated into a reclamation plan that satisfies 30 CFR 817.21 - 817.25.

From the information provided in the report, it appears that there is insufficient material available for reclamation. Table 4-5 shows that seven inches of suitable material is available from the Quigley (Q1C) mapping unit. Also, 31 inches, to be used for reclaimed road cuts only, is available from the same Quigley (Q1C) mapping unit. However, if this material is used for reclamation purposes, the borrow area must also be reclaimed. It does not appear that sufficient suitable plant growth material is available for both operations.

Analysis of the situation indicates that the most viable solution is to use the fill material that exists in the disturbed area and the bench material on which the facilities now sit. If this approach is chosen, a more thorough soil sampling program and a plan for preparing the bench area for revegetation will be required. This could include ripping to help break the compaction plus other manipulation to prepare a suitable seedbed.

The existing survey information includes chemical analysis of one sample from the fill material. More samples will have to be taken and analyzed before final judgement can be made on the suitability of this material as suitable plant growth medium. I suggest that Beaver Creek contact my staff to determine the exact intensity of sampling. Also, the bench area where the existing plant sits will have to be thoroughly sampled and analyzed. If the chemical analyses of these areas indicate unsuitability as a plant growth medium, it appears the other alternative may have to be importation of a suitable material.

The response as submitted for Beaver Creek Coal Company on September 19, 1980 for Special Stipulation No. 14 (Spring Survey) has been reviewed by OSM and we have received the USGS (November 24, 1980) and the Forest Service (December 4, 1980) responses. The technical adequacy of Beaver Creek's response was lacking in respect to the geohydrologic system and should be updated when more information becomes available.

We have also received in this office on September 29, 1980, Beaver Creek's response to special Stipulation No. 22 (Revegetation Reference Area). This submission did not provide all the information required by Special Stipulation No. 22. However, the vegetation survey received on November 11, 1980 provided the additional information needed to fulfill the requirements of this stipulation. Comments on this stipulation were received from the USGS on November 24, 1980 and the Manti LaSal National Forest on December 4, 1980. Concurrence for approval of this stipulation was received from the Forest Service through phone conversation on December 19, 1980.

In summary, Beaver Creek Coal Company's response to Special Stipulation No. 22 (Revegetation Reference Area) is acceptable. The responses to Special Stipulations 10, 14, 16, and 27 are complete but technically deficient. These Special Stipulations will be satisfied subject to receipt of adequate responses to the remaining questions.

If you have any questions in regard to this review, please contact John Nadolski (303) 837-3773 of my staff.

Sincerely,



DONALD A. CRANE

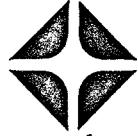
cc: J. Moffitt, USGS, SLC
R. Christensen, Manti LaSal N.F., Price
D. Guy, Beaver Creek Coal Co., Price
R. Costello, Arco, Denver



JAN 23 1981

DIVISION OF
OIL, GAS & MINING

ARCO Coal Company
Permits and Compliance Group
555 Seventeenth Street
Mailing Address: Box 5300
Denver, Colorado 80217
Telephone 303 575 7500

file in

Gordon Cr. #2, #3
#6
Huntington #4
Sim

January 14, 1981

Mr. James W. Smith, Jr.
Coordinator, Mined Land Development
Division of Oil, Gas and Mining
State of Utah
1588 West North Temple
Salt Lake City, Utah 84116

2 - ACT/007/016
316 - ACT/007/017
4 - ACT/015/004 ✓

Dear Mr. Smith:

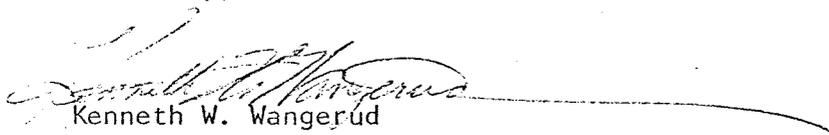
Enclosed please find two copies each of several reports prepared in response to mining and reclamation plan special stipulations for the Beaver Creek Coal Company, Gordon Creek #2 Mine. The reports are as follows:

- 1) Special Stipulation No. 1H - Spring Survey and Groundwater Hydrology
- 2) Special Stipulation No. 3B - Vegetation Survey
- 3) Special Stipulation No. 4 - Archaeology Survey

The reports entitled Raptor Survey and Investigation of Powerline Raptor Hazard for the Gordon Creek #2, #3 and #6 Mines and the Huntington Canyon #4 Mine have been completed as part of the on-going wildlife studies and two copies are also enclosed for your review.

If you have any questions concerning the above, please contact me at (303) 575-7523.

Sincerely,


Kenneth W. Wangerud
Permit Coordinator



KWW:smf

Enclosure

cc: Max Robb/Beaver Creek Coal Company

DIVISION OF
OIL, GAS & MINING