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State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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November 29, 1995

Paige Beville, Manager
Environmental, Health and Safety
ARCO Coal Company
555 17th Street, Room 2170
Denver, CO 80202

Re: Corrected Pages, Decision Document - Phase II Bond Release, Huntington #4 Mine, Mountain Coal Company, ACT/015/004, Folder #3 and Permit Binder, Emery County, Utah

Dear Ms. Beville:

I am enclosing corrected pages 3 and 4 from the Decision Document for the Phase II bond release for the Huntington #4 Mine. Please replace these pages in your document.

If you have any questions, please call me.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Pamela Grubaugh-Littig'.

Pamela Grubaugh-Littig
Permit Supervisor

Enclosure

cc: Price Field Office



woody plan density.

The Division sampled only for vegetative cover on the reclaimed mine site and the reference area. Vegetation composition and diversity data were obtained from the cover data. The Division also found that the reclaimed area was either significantly greater than or equal to the vegetation reference area.

Statgraphics, Version 6 (1992) was used for all of the statistical analysis. The Division found no significant difference between the vegetation on the lower pad area and the reference area. Data from the Division and Mountain Coal Company indicate the same statistical conclusion. According to the Division's definition of successful revegetation establishment, Huntington #4 Mine has met the minimum qualification for the vegetation cover portion of Phase II bond release. R645-301-356.120 states that the reclaimed area only has to meet 90 percent of the success standard. All of the statistical conclusions used in this analysis were based on 100 percent of the standard. This fact provides greater confidence for Phase II bond release at this site. All of this information was forwarded to OSM-AFO on May 5, 1994, prior to the bond release inspection.

A final report by Division Biologist, Susan White, was done July 7, 1994 subsequent to the Phase II bond release field inspection and recommended Phase II bond release pursuant to R645-301-880.320.

Contribution of Additional Suspended Solids

An analysis related to past and present erosion rates from reclaimed mine sites were submitted by Mountain Coal Company using a Sediment Production Comparison generated by the Civil Software Design SEDCAD + Program, Version 3 (1992). The runoff volume, peak flow and sediment concentration were compared between past and present activities. Initial results of this computer analysis indicated that the sediment loads from the reclamation activities are no different than the pre-mining conditions. This information was forwarded to OSM-AFO on May 5, 1994.

The Universal Soil Loss Equation used in SEDCAD does not allow for gully erosion and an on-site assessment was made to ascertain any significant rill or gully erosion. This field assessment was made May 18, 1994. Based on visual observation by the Division Hydrologist, Tom Munson, he concluded and the Division find that the site was stable. A Phase II bond release was recommended based on the outcome of the site visit observation and the Sediment Production Comparison for pre- and postmining pursuant to R645-301-880.320, as well as reviewing past inspection report to document overall stability. The site has sustained several severe

storm events successfully.

This Phase II bond release encompasses the entire surface disturbance for the Huntington #4 Mine.

Remaining Reclamation

Remaining reclamation at the Huntington #4 Mine includes the removal of the pond. This was proposed to be removed in 1995 and reclamation was completed in 1995. Mountain Coal Company started collecting the requisite vegetative information for two years for final bond release in 1994.

Other Actions Surrounding Bond Release Inspection

Lowell Braxton sent a letter to Thomas Ehmett, dated July 6, 1994 stating that, "no TDN's were issued as a function of the Phase II bond release inspection and the Division has received no correspondence from OSM suggesting a lack of concurrence with the Phase II bond release, and therefore, requests a written confirmation supportive of the Phase II bond release application." On July 18, 1994 TDN X94-020-179-003 was received at the Division for "failure to eliminate all highwalls at the Huntington #4 Mine", as a result of the May 18, 1994 Phase II Bond Release inspection. The Division submitted a response to OSM-AFO for this TDN on July 28, 1994. On September 21, 1994 OSM found the July 28, 1994 TDN response appropriate.

On August 22, 1994 Lowell Braxton sent a letter to Thomas Ehmett requesting comments on any other outstanding issues at the Huntington #4 Mine. No comments on any technical issues related to the Phase II bond release have been received to date.

On November 2, 1994 the findings and chronology for the Phase II bond release were forwarded to OSM-AFO. By letter dated November 23, 1994, OSM-AFO requested a Decision Document for the Phase II bond release for Huntington #4 Mine.

On February 15, 1995 a letter of concern from Aaron Howe (Acting Forest Supervisor, Manti La Sal) to Thomas Ehmett (Field Office Director, OSM-AFO) stated that there was concern about whether or not the reclamation of the pond was included in the calculation of the remaining bond, but agreed that the pond was no longer needed.