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October 29, 1979

Mr. Tom Paluso  
Soldier Creek Coal Company  
Hidden Valley Mine  
P.O. Box AS  
Price, Utah 84501

RE: Interim Program Mine Plan  
Review of the Hidden Valley Mine.

Dear Tom:

The Division has completed the initial review of the Interim Period Mine Plan submitted for the proposed Hidden Valley Mine. Comments to the submittal and items of additional information or clarification required are listed below:

1. Cover Letter: All contents within the submittal cannot be held as confidential. Only information relating to the size, nature or location of the "ore body" can be so held from public information. Please indicate which sections of the report that deal with this information you wish to be held as confidential.
2. Page i: The Division would like to point out, at this time, that the proposed railroad site at Levan appears to be subject to regulation under the permanent program, and when the permanent program comes into effect, a permit application would be required for the site.
3. Page i: If the need for discharge of preparation plant water should arise, how will the discharge be contained, and if discharged be treated?

4. Page 2-2: Specifically, what flow measure techniques and equipment will be utilized? What lab will be contracted to perform the water analysis? Please indicate on a map all surface and groundwater monitoring stations. Concerning the ponds, details for the decant systems are required. Also, seepage collars are required on pipes passing through embankments and oil skimmers are required on the primary discharge mechanics.
5. Page 4-11: As no primary discharge system is shown for the portal area pond, a pump capable of decanting the treated water will be required to be available.
6. Pages 4-7 & 4-15: Cross-sections for the surface facility sedimentation pond embankment and the refuse pile sedimentation pond embankment do not show Keyway cuts at the foundation interface. These will be required.
7. Page 5-2: Refuse disposal. A. What thickness of surficial material will be removed prior to depositing refuse material? B. When will the surficial material be stockpiled and how will it be stabilized? C. What is the slope of the presently existing ground surface in the refuse area? D. What will the surface configuration of the refuse pile be and in what sequence will refuse be deposited? E. What procedures will be used to compact the refuse material and what is its contemplated static safety factor? F. Segregation, stockpiling, and protection of topsoil, or surficial material, will be required in all areas to be disturbed, unless it can be adequately demonstrated that an insufficient amount of material exists making it impractical to do so or analysis shows that the material can not be used as a medium for revegetation. Please submit a map showing locations of all topsoil stockpiles and specific measures to be taken for protection of the stockpiles. Using available topsoil as fill material and covering with asphalt is not an acceptable means of stockpiling and protection. Several soil samples should be collected and analyzed from each area to be disturbed to obtain an adequate representation of the soils existing in that area. Subsurface soils, where they exist, should also be analyzed to determine their potential for revegetation.
8. Page 5-3: Revegetation - A. The seed mix proposed for use does not include any shrubs or half shrubs referred to in Appendix #6. B. Supplemental watering, mulch and fertilizer treatments are not mentioned as a possibility to achieve revegetation success. C. Amounts of seed to be used should be increased to 20 pounds per acre. D. Thickness of surficial material to be stockpiled and respread is not indicated. E. Disturbed areas not directly required for mining such as sediment pond embankments, diversions cut in unconsolidated material, and outslopes of permanent fill slopes must be revegetated as soon as possible.

Mr. Tom Paluso  
October 29, 1979  
Page Three

9. Page 6-1: The Division cannot approve the project without a mining plan. The mining plan affects the development of a subsidence monitoring plan and the groundwater monitoring plan. In addition, surface effects of underground mining may require certain areas to be left supported. The Division will require a subsidence monitoring program for this project.
10. Appendix A: Topographic detail on this appendix is very poor, more detail on this area is needed. Supplying a mylar or other reproducible and transparent print would be helpful.
11. Appendix B: Specifications on diversions are required, ie., profile and dimensions. As shown on the map, drainage from part of the raw coal pile does not flow into a sediment pond. This must be corrected.
12. General comments:
  - A. More information is required showing final proposed reclaimed land configuration and proposed postmining land use.
  - B. A commitment to have sediment ponds operational prior to major disturbance and prior to coal production is needed.
  - C. All proposed topsoil stockpiles must be shown on a map.
  - D. An archeological survey is recommended prior to site disturbance.
  - E. Please be reminded that the permanent program requires more detailed soils information such as a complete soil survey and soils map. It would be to Soldier Creek Coal Company's benefit to obtain this information prior to disturbing the area.

If you have any questions please feel free to call.

Sincerely,



RONALD W. DANIELS  
COORDINATOR OF MINED LAND DEVELOPMENT

cc: John Hardaway,  
Office of Surface Mining  
Steve McNeil,  
Utah State Div. of Health

RWD/te