

0021



Soldier Creek Coal Company  
**HIDDEN VALLEY MINE**

Telephone 801 - 637-4429

P.O. Box AS  
Price, Utah 84501

To Jim  
Route a Copy  
& file  
JWS  
To Lee, first\*

June 2, 1980

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

**RECEIVED**  
JUN 5 1980

DIVISION OF  
OIL, GAS & MINING

Re: Access Road  
Hidden Valley Mine  
ACT/015/022

Dear Mr. Daniels:

On May 8th, an inspection of the Hidden Valley Mine site was conducted by Joe Helfrich and Tom Suchoski. At this time, Mr. Helfrich indicated that techniques being utilized in construction of the access road present a potential violation, i.e., side-casting of material.

The cut-and-fill method being used for construction of the access road, has long been a standard practice throughout the industry. It offers a practical means of road construction through rugged terrain, while minimizing unnecessary environmental damage.

The Hidden Valley Mine access road is being built through a very rugged canyon. The characteristics of this canyon consist basically of a cliff forming sandstone outcrop, strewn with large boulders. Extensive blasting will be required for any construction in this area.

It is believed, due to the rough topography, the cut-and-fill method is best suited to minimize environmental damage. Alternative methods would create a much larger disturbed area. Either additional access routes to facilitate embankment construction equipment or extensive highwalls would be required if alternative methods were used. Also, these alternative methods of construction show no distinct advantage for minimizing additional contributions of suspended solids to runoff from the road embankments.

True

True

Approved

Since the cut-and-fill method does not always allow embankments to be constructed in successive uniform layers, their long-term stability has been questioned. Because of size limitations of laboratory testing equipment, little reliable information is available on the strength of embankment sections composed of large boulders. Large-scale test embankments in the field offer the best method of testing such material.

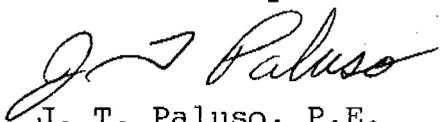
In the past, road construction throughout the West has employed methods similar to those being used at Hidden Valley Mine. Many of these roads were built under nearly identical conditions. An analysis of existing roads will attest to the long-term stability of the cut-and-fill method.

In accordance with 30 CFR 817.162, paragraph (d) (9), (Volume 44, Number 50 of the Federal Register, dated March 13, 1979), a minimum safety factor of 1.25 is required for all Class II road embankments. It is the professional opinion of myself and Horrocks Engineers that the safety factor of all road embankments will be at least equal to, if not greater than, the 1.25 required. Horrocks Engineers is the consulting firm responsible for design and construction management of the access road.

If you should have any questions, please feel free to contact me.

Sincerely,

SOLDIER CREEK COAL COMPANY  
Hidden Valley Mine



J. T. Paluso, P.E.  
Project Engineer

JTP:dt

7-15-80

Joe,

I agree with you that Hidden Valley should supply more information to support their request for a variance. ~~Can~~ would you work with Lee on this.

Jim

## Comments

Pg #1 para (3)

Why does rough topography justify the cut + fill method?? We should require more info as opposed to a mere statement.

may want to require the following:

- a) maps indicating cross sections of method used versus alt method, showing highwall and sidelasting contours.
- b.) data to support rationale that sidelasting is less environmentally degrading than increased highwall. i.e. affected area
- c) runoff potential for contrasting methods
- d) soil loss for highwall vs. sidelasting
- e) revegetation potential for comparative areas.
- f) reclamation potential (ACC) figures.

Ray: Jim

I feel the above mentioned factors should be included at a minimum in order to justify granting a variance on road construction under either interim or perm program.

My Paluso is correct in his statement, however I feel more supportive data should be required

Joe

5906

Mr. J.T. Paluso,  
PROJECT ENGINEER  
SOLDIER CREEK COAL COMPANY  
P.O. Box AS  
Price, Utah, 84501

RE: ACCESS ROAD  
HIDDEN VALLEY MINE  
ACT/015/022

Dear Mr. Paluso,

The State of Utah has promulgated the Coal Mining and Reclamation, Permanent Program. Your road fits under these regulations as a Class II road. The Division of Oil, Gas and Mining (Division) has reviewed your letter with regard to these regulations, since they have been promulgated under the ACT (U.C.A. 40-10-1 et. seq.).

Since you and your consultants are certifying by your letter of June 2, 1980, the <sup>long term</sup> ~~the~~ safety factor of 1.25 for the stability of this embankment, the Division <sup>any further</sup> does not require ~~additional~~ information at this time.

Sincerely

Leland L. Spruill

cc. Don Wane OSM