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STATE OF UTAH  
NATURAL RESOURCES  
Oil, Gas & Mining

Norman H. Bangerter, Governor  
Dee C. Hansen, Executive Director  
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October 8, 1986

Mr. John W. Rains  
Chief Mining Engineer  
California Portland Cement Div.  
Calmat Company  
P. O. Box 947  
Colton, California 92324-0514

*Jah*  
Dear Mr. Rains:

Re: Determination of Completeness with Technical Deficiencies,  
California Portland Cement Company, Hidden Valley Mine,  
ACT/015/007, Folder #2, Emery County, Utah

The Utah Division of Oil, Gas and Mining has completed a review of the Reclamation Plan and amendments submitted by California Portland Cement Company for the Hidden Valley Mine. The Division has determined the plan to be complete.

Per the enclosed letter, notice has been given to all appropriate agencies having jurisdiction over, or an interest in, the area of the proposed operations that a complete plan is available for public review.

As discussed with your consultant, Joe Jarvis, on Sept. 23, 1986, California Portland Cement Company must publish an advertisement in the Emery County Progress and the Newspaper Agency Corporation providing all information as required under UMC 786.11(a), with proof of publication sent to the Division for each week of the consecutive four (4) week publication period.

Providing no public protests are initiated within the allotted time frames pursuant to UMC 786.12(b), the Division will continue to proceed with the permit approval process.

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Mr. John W. Rains  
INA/015/007  
October 8, 1986

While the public notice process is ongoing , several technical deficiencies must be addressed before the Technical Analysis can be finalized. Please find these attached. Your prompt reply is appreciated.

Please contact me if you should have any questions regarding this matter.

Sincerely,



Lowell P. Braxton  
Administrator  
Mineral Resource Development  
and Reclamation Program

JJW/djh  
Enclosure(s)  
cc: J. Jarvis, JBR  
J. Whitehead  
0800R-28

TECHNICAL DEFICIENCIES

California Portland Cement  
Soldier Creek Coal Company  
Hidden Valley Mine  
INA/015/007, Emery County, Utah

September 23, 1986

817.13-15 Casing and Sealing (PGL)

The applicant must locate drill hole #4 and plug the hole with five feet of surface cement. Moreover, the artesian wells must be plugged in accordance with the abandonment procedures described in the Division of Water Rights' Administrative Rules for Water Well Drillers.

817.25 Nutrients and Soil Amendments (DD)

Concerning the lab data of soils S-1, S-2, S-3 and S-4 in the Appendix II and in discussion with Joe Jarvis, conductivity measurements are actually in Mmhos/cm rather than Umhos/cm as stated in the lab report. This needs to be changed in the report.

Metals extracted with DPTA need to be delineated in the report. In all samples, NO<sub>3</sub>-N was above 50 mg/kg; was nitrate extracted with DPTA? These values are excessively high and need to be addressed, especially considering the fertilization plan proposed.

In general, the lab data appeared to be questionable. Several values were extreme and would not be anticipated for the mine site location. It is suggested that additional sampling and analysis be performed by a different lab to assure accurate results are obtained.

UMC 817.42 Hydrologic Balance: Water Quality Standards and Effluent Limitations (TM)

The applicant must identify the sampling points for Ivie Creek on Plate V, and give a verbal description of these points in the text.

UMC 817.43-44 Hydrologic Diversion and Conveyance of Overland  
Flow, Shallow Groundwater Flow, and Ephemeral  
Streams (TM)

The applicant refers to bedrock and rocky soils as a criteria for not using riprap or filter blankets. The applicant states that in the area of the ephemeral channel reclamation, the applicant can only speculate if the materials found under the culvert are of coarse enough nature to forego the use of filter blankets. Therefore, the plan must commit that at the time of actual removal of the culvert, a soil sample be taken for particle size analysis and a determination be made as to whether a filter blanket is needed.

In the areas where bedrock is encountered, the riprap will be necessary on the channel sides at least one foot above the design flow depth to protect the fill on the sides. This must be reflected in the plan.

The applicant has calculated all peak flows using a curve number of 80, but gives no justification for this curve number other than professional judgment. The Division needs some documentation to support this conclusion. This should include hydrologic soil groups, vegetation types, and cover conditions.

The channel above the A Seam Portal area should be left alone and the fact that it is considered a diversion removed from the plan. The existing channel has stabilized with vegetation and shows no signs of water movement. Disturbance of this vegetation and diversion would be more harmful in terms of erosion and stability of this hillside than leaving it alone.

The channel proposed from the sediment pond to the creek must be riprapped to prevent the potential for headcuts to form and cut back under the pad below the sediment pond. If both of the proposed channels from the A-Seam Portal pad are constructed based on final configuration, then riprap protection must be used to stabilize both of these channels. Please provide the supporting design information for this.

Since the reaches of both of these channels are small and there is adequate rock in the area, then this will prevent future maintenance and offer greater stability within the channel leading from the pond to Ivie Creek due to the elimination of the A-Seam Portal diversion and the potential for severe thunderstorm activity in the area.

Water bar spacing should be based on Figure 7.11 taken from the textbook by Barfield, Warner, and Haan, "Applied Hydrology and Sedimentology for Disturbed Areas". Currently there is no profile for the Class II road, but when one is developed, the spacing must be checked against Figure 7.11 and slope gradient must be considered to see if the waterbars are spaced adequately to prevent erosion. As a suggestion, the location of the waterbars should be placed where their discharge is in areas where vegetation or rocks exist to protect the outslope of the reclaimed road.

The applicant may want to riprap the uphill face of the waterbars to prevent any future maintenance during the bonding period.

817.89 Disposal of Non-Coal Wastes (PGL)

The applicant needs to describe how non-coal wastes will be handled during reclamation.

817.95 Air Resources Protection (PGL)

The applicant needs to describe how fugitive dust emissions will be controlled during reclamation operations (page 17).

817.101 Backfilling and Grading: General (PGL)

The exposed coal seams will be graded to a slope of approximately 2h:1v. Slopes will be covered with 2" of topsoil. Backfill volumes will be about 11,000 cubic yards. A minimum static factor of safety of 1.3 must be demonstrated for the backfilled highwalls.

817.160-165 Roads: Class II (PGL)

The applicant submitted a letter in the interim plan (September 5, 1979) for the proposed vertical alignment for the Hidden Valley Access Road. The as-built road alignment must be submitted that will be retained.

The plan notes that the imported roadbase is suitable for revegetation when prepared by proper mulching and fertilizing. Has this been documented? If so, please submit.

The fence will remain after bond liability or be removed. The plan must indicate this.

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