



# State of Utah

DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF OIL, GAS AND MINING

Norman H. Bangarter  
Governor

Dee C. Hansen  
Executive Director

Dianne R. Nielson, Ph.D.  
Division Director

355 West North Temple  
3 Triad Center, Suite 350  
Salt Lake City, Utah 84180-1203  
801-538-5340

*Informal Hearing  
(set up) Henry*

December 13, 1991

CERTIFIED RETURN RECEIPT REQUESTED  
No. P 540 713 869

Mr. Lee Edmonson  
Properties Division  
Hidden Valley Coal Company  
1801 East University Drive  
Phoenix, Arizona 85034

Dear Mr. Edmonson:

Re: Informal Hearing and Assessment Conference for State Violation, N91-26-8-2, ACT/015/007, Hidden Valley Coal Company, Emery County, Utah

In accordance with a telephone conversation between Denise Dragoo and myself, please be advised that the Informal Hearing and Assessment Conference on state violation N91-26-8-2, Hidden Valley Mine has been established for Friday, December 20, 1991, beginning at 10:00 a.m.

Pertinent, written material you wish reviewed before the conference can be forwarded to me at the address listed above.

The conference will be held in the office of the Division of Oil, Gas and Mining.

Best regards,

Dianne R. Nielson  
Director

vb

cc: D. Dragoo  
K. Knopp  
J. Helfrich  
DOGM Price Office  
Public Notice Board

*Informal Hearing  
Site*

**FABIAN & CLENDENIN**  
A PROFESSIONAL CORPORATION  
ATTORNEYS AT LAW  
TWELFTH FLOOR  
215 SOUTH STATE STREET  
P. O. BOX 510210  
SALT LAKE CITY, UTAH 84151  
TELEPHONE (801) 531-8900  
FACSIMILE (801) 596-2814

RALPH H. MILLER  
BRYCE E. ROE  
GEORGE D. MELLING, JR.  
WARREN PATTEN  
M. BYRON FISHER  
STANFORD B. OWEN  
WILLIAM H. ADAMS  
ANTHONY L. RAMPTON  
PETER W. BILLINGS, JR.  
THOMAS CHRISTENSEN, JR.  
RAND M. ELISON  
DENISE A. DRAGOO  
JAY B. BELL  
DANIEL W. ANDERSON  
GARY E. JUBBER  
ROSEMARY J. BELESS  
W. CULLEN BATTLE  
KEVIN N. ANDERSON  
RANDY K. JOHNSON  
NORMAN J. YOUNKER

MICHELE MITCHELL  
JOHN E. S. ROBSON  
DOUGLAS B. CANNON  
DOUGLAS J. PAYNE  
ROBERT PALMER REES  
KENLEY W. BRUNSDALE  
DIANE H. BANKS  
P. BRUCE BADGER  
JOHN (JACK) D. RAY  
MICHAEL L. CHIDESTER  
KATHLEEN H. SWITZER  
CRAIG T. JACOBSEN  
ROBERT K. HEINEMAN  
SANDRA K. ALLEN  
LAURA L. MOSER  
GEOFFREY P. GRIFFIN  
OF COUNSEL  
PETER W. BILLINGS

HAND DELIVERED

December 12, 1991

Ms. Vickie Bailey  
Utah Division of Oil, Gas & Mining  
355 West North Temple  
3 Triad Center, Suite 350  
Salt Lake City, Utah 84180-2303

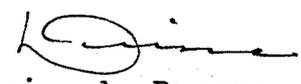
RE: Notice of Violation No. N91-26-8-2  
Hidden Valley Mine, Permit No. ACT/015/007

Dear Vickie:

In my letter to you of December 11, 1991 concerning the above-referenced Notice of Violation No. N91-26-8-2, I mistakenly referenced CalMat Company of Arizona rather than Hidden Valley Coal Company. Will you please make that correction and note that Hidden Valley Coal Company is requesting that Notice of Violation No. N91-26-8-2 be vacated.

Thank you for your assistance in this matter.

Very truly yours,



Denise A. Dragoo

DAD:jmc  
cc: Lee Edmonson  
Karla Knoop  
Dr. Dianne R. Nielson  
Pamela Grubaugh-Littig  
Lowell Braxton  
Susan White  
Tom Munson  
Thomas A. Mitchell, Esq.

**RECEIVED**

DEC 12 1991

DIVISION OF  
OIL GAS & MINING

*Informal Hearing  
File*

**FABIAN & CLENDENIN**

A PROFESSIONAL CORPORATION  
ATTORNEYS AT LAW

TWELFTH FLOOR  
215 SOUTH STATE STREET  
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OF COUNSEL  
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ROSEMARY J. BELESS  
W. CULLEN BATTLE  
KEVIN N. ANDERSON  
RANDY K. JOHNSON  
NORMAN J. YOUNKER

HAND DELIVERED

December 11, 1991

Ms. Vickie Bailey  
Utah Division of Oil, Gas & Mining  
355 West North Temple, Suite 350  
Salt Lake City, Utah 84180-2303

RE: Notice of Violation No. N91-26-8-2,  
Hidden Valley Mine, Permit No. ACT/015/007

Dear Vickie:

On behalf of CalMat Company of Arizona ("Calmat"), we respectfully request the Division of Oil, Gas & Mining ("Division") to review the fact of violation of the above-entitled notice of violation ("NOV"). CalMat requests that this NOV be vacated and that the Division withdraw the required abatement action. CalMat is concerned that the abatement action requested by the Division will cause environmental harm to the permit area and will increase the period of time for which the operator is responsible for reclamation and revegetation success.

The current abatement time set by the NOV is December 20, 1991. We are requesting the Board of Oil, Gas & Mining to extend the period for abatement pending the Division's hearing on this matter.

Thank you for your assistance in this matter.

Very truly yours,



Denise A. Dragoo

DAD:jmc

- cc: Lee Edmonson
- Karla Knopp
- Dr. Dianne R. Nielson
- Pamela Grubaugh-Littig
- Lowell Braxton
- Susan White
- Tom Munson
- Thomas A. Mitchell, Esq.

**RECEIVED**

DEC 11 1991

DIVISION OF  
OIL GAS & MINING

BEFORE THE DIVISION OF OIL GAS AND MINING  
DEPARTMENT OF NATURAL RESOURCES  
STATE OF UTAH

---00000---

IN THE MATTER OF THE APPEAL : FINDINGS, CONCLUSIONS  
OF FACT OF VIOLATION AND ORDER  
#N91-26-8-2, HIDDEN VALLEY :  
COAL COMPANY, HIDDEN VALLEY : INFORMAL HEARING  
MINE, EMERY COUNTY, UTAH : CAUSE NO. ACT/015/007

---00000---

On December 20, 1991, the Division of Oil, Gas and Mining ("Division") held an informal hearing concerning the fact of violation for the above-referenced Notice of Violation ("NOV"). The following individuals attended:

Presiding: Dianne R. Nielson, Director  
Division of Oil, Gas and Mining

Petitioner: Lee Edmonson  
Hidden Valley Coal Company  
("Hidden Valley")

Denise Dragoo  
Fabian and Clendenin  
Counsel for Hidden Valley Coal Company

Joe Jarvis  
JBR Consultants  
Consultant to Hidden Valley Coal Company

Karla Knoop  
JBR Consultants  
Consultant to Hidden Valley Coal Company

Division: Lowell Braxton  
Associate Director for Mining

Pamela Grubaugh-Littig  
Permit Supervisor

Susan White  
Reclamation Specialist

William Malencik  
Reclamation Specialist  
Issuing Inspector

Board: Ron Daniels  
Assessment Conference Officer  
Penalty Assessment

Joe Helfrich  
Assessment Officer  
Penalty Assessment

The Findings, Conclusions, and Order in this matter are based on information provided by the Petitioner in connection with this informal hearing, and information in the files of the Division. During the informal hearing, counsel for Hidden Valley presented arguments as to why the NOV should be vacated. Counsel offered to further brief the legal arguments and the presiding officer provided that additional briefs could be submitted by December 30, 1991. The Division agreed to planimeter the road, pads, and related outslope areas. This information was considered as part of the review of fact of violation.

In the brief filed by counsel for Hidden Valley, vacation of the NOV was requested, based on the following reasons.

1. Hidden Valley is exempt from regulation under the federal Surface Mining and Reclamation Act and the Utah Coal Mining and Reclamation Act because 250 tons of coal were not mined at the Mine and no coal mining activity occurred at the Mine during the interim program after January 3, 1977.

2. The NOV is barred by the applicable statute of limitation of two years.

3. The Division has waived or is estopped from taking enforcement action because the Division failed to require reclamation of road upslopes and outslopes (cut and fill slopes) in either the approved reclamation plan or prior to approval of Phase I bond release.

The Consultant for the Operator also stated during the informal hearing that the reclamation requested in the NOV would create additional damage to fine-particle-covered portions of the outslopes.

#### FINDINGS OF FACT

1. Notice of this hearing was properly given.

2. The Assessment Conference, to review the proposed penalties for NOV N91-26-8-2, was held immediately following this informal hearing regarding fact of violation. Requirement to pay the assessed penalty is stayed pending the decision in the informal review of fact of violation.

3. NOV N91-26-8-2 was issued on November 22, 1991. It includes two parts. Part 1 of 2 was written for failure to maintain diversions to be stable and failure to minimize erosion to the extent possible, in accordance with Utah Admin. R. 614-301-742.312.1 and 614-301-742.113, with respect to the road outslope and upslope. Part 2 of 2 was written for failure to clearly mark with perimeter markers all disturbed areas and failure to seed and revegetate all disturbed areas, in accordance with Utah Admin.

R. 614-301-521.251 and 614-301-354, with respect to the road and stream disturbed outcrops and road upslopes.

4. As enacted in 1977 and 1979 respectively, the Surface Coal Mining and Reclamation Act (SMCRA) and the Utah Coal Mining and Reclamation Act (UCMRA) both include the definition:

"operator" means any person, partnership or corporation engaged in coal mining who removes or intends to remove more than two hundred and fifty tons of coal from the earth by coal mining within twelve consecutive calendar months in any one location. (emphasis added)

SMCRA § 701(13); Utah Code Ann. § 40-10-3(7).

5. UCMRA defines "coal mining" in the context of the term "surface coal mining" in part as:

activities conducted on the surface of lands...including excavation for the purpose of obtaining coal....

Utah Code Ann. §40-10-3(18).

6. Chapter III of the Reclamation Plan submitted and approved for the Hidden Valley Mine, includes the following description:

The mining plan for Hidden Valley proposed production to begin in June 1981. Maximum production was to be 500,000 tons annually with an expected mine life of 40 years. The initial development work commenced on April 17, 1980 with this goal in mind. However by August, 1980 it became evident that economic conditions had changed and it was decided by the company to cease development.

A 0.5 mile graveled Class II road was completed to gain access to the coal seams adjacent to Ivie Creek. At the coal seams two pads were constructed for the future portal operations area. Bulk coal samples were obtained from the existing exploratory audits in the two naturally exposed coal seams. These exposed coal seams were faced up and diversions were constructed above the seams in anticipation of portal construction.

Hidden Valley Coal Mine Reclamation Plan, Chapter III, pp. 1 and 4, May 1986.

7. In the minutes of a September 9, 1980 meeting of the Soldier Creek Coal Company Management Committee, provided by counsel for Hidden Valley, the status of operations of the Hidden Valley Mine are discussed:

After further discussion, and upon motion duly made, seconded, and unanimously carried, it was decided that:

(1) Further development of the Hidden Valley property will be temporarily suspended and will be reassessed from time-to-time in light of the then current level of capital expenditures believed necessary to make the property operational as a mine and the costs of mining and hauling coal therefrom vis-a-vis the market for coal; (emphasis added)

Minutes of Soldier Creek Coal Company Management Committee, September 9, 1980, p.4.

8. As stated in Utah Code Ann. §40-10-4:

The Utah Mined Land Reclamation Act (Chapter 8 of Title 40), and the rules and regulations adopted under it, where appropriate, and not in conflict with the provisions of this chapter or the rules and regulations adopted under it, shall be applicable to coal mining operations and reclamation operations. (emphasis added)

9. Section III of Chapter III of the Hidden Valley Reclamation Plan (page 27) requires, in accordance with UMC 817.106, that:

The rills or gullies that may appear during post-reclamation monitoring will be stabilized by filling with soil and rock. Chronic sites will be stabilized with small gabions or rock check dams.

10. There is no map or other documentation in the Reclamation Plan which specifically identifies the areas included in the Disturbed Area, stated to be approximately 6.7 acres. The text of the report refers to the disturbed area, stating:

The disturbed area is approximately 6.7 acres consisting of an access road, pads and drainage control structures.

Chapter III, page 6.

Planimetry conducted by Division staff following the informal conference indicates that the area consisting of the road surface, pad areas with matting and graded/seeded, and sediment control structures (Plate III) total 6.1 acres. This acreage is consistent with calculations provided by Hidden Valley in response to the informal conference. Planimetry of that area plus the outslopes and upslopes of the road and the southern outslopes of the pads totals 9.1 acres.

11. Disturbed Area markers have been placed at both sides of the road. The markers were not placed at the foot of the outslopes or the top of the upslopes of the road.

12. There is no map in the plan which delineates the disturbed area boundary.

13. The Reclamation Plan states:

The entire 6.7 acres of disturbed ground will be properly scarified, seeded, fertilized, mulched and covered to provide the best possible opportunity for plant growth. The road fill slopes and some small sites will require hand application of seed, mulch and fertilizer.

Chapter III, Section VI, page 56.

14. The Reclamation Plan is silent on the subject of revegetation of cut slopes of the road.

15. Both the Division staff and the consultant for Hidden Valley agreed that, because of saline soil conditions and concerns for fine soil profiles and rocky areas, seeding procedures may vary and may be largely accomplished through broadcasting.

16. The existing Phase I surety amount is sufficient to cover the seeding of the subject fill slopes.

CONCLUSIONS OF LAW

1. While Hidden Valley may not have "mined 250 tons of coal within a consecutive 12 month period," the documentation in the Reclamation Plan and the September 9, 1980 minutes of the Management Committee clearly indicate that they "intended to remove more than 250 tons of coal." Furthermore, the Management Committee "temporarily suspended" further development in September, 1980. It did not terminate development.

2. The Division did require and the reclamation plan requires stabilization of rills and gullies, including those which "may appear during post-reclamation monitoring."

3. The Division did require and the reclamation plan requires revegetation of the fill slopes associated with the road.

4. The reclamation plan is silent on requirements for revegetation of the cut slope of the road.

5. The Division did require and the reclamation plan requires revegetation of the fill slopes of the pads.

6. It is not possible to determine whether the fill slopes associated with the road were included in the disturbed area acreage, and hence considered in the determination of reclamation surety. The plan provides for reclamation of those fill areas. Planimetry data is not consistent with the stated acreage of the

disturbed area. There is no map in the plan which delineates the disturbed area boundary. However, failure by Hidden Valley to properly designate the fill slopes as disturbed area or failure to include the area in the reclamation calculation does not obviate the responsibility of Hidden Valley to reclaim the fill slopes, as described in the plan.

7. The Division has not waived and hence is not estopped from taking enforcement action.

8. The statute of limitation does not apply.

9. Hidden Valley's consultant has indicated that they did not seed the fill slopes of the road or the subject fill slopes associated with the pads. There is no information to indicate that the Division was aware of those facts at the time of phase I bond release. The success of erosion mitigation measures, including prevention of rills and gullies and reestablishment of vegetation is ongoing during the reclamation period. The reclamation plan and the performance standards require mitigation when problems are noted by the operator or the Division. Because that monitoring and preventative action is an ongoing responsibility, it cannot be stayed by any statute of limitations.

ORDER

NOW THEREFORE, it is ordered that:

1. NOV N91-26-8-2 parts 1 of 2 and 2 of 2 are upheld, except with respect to revegetation of the cut slopes of the road

as discussed in Part 2 below.

2. Hidden Valley is directed to submit the plans and move the disturbed area markers, as required in the NOV. The Division will work with Hidden Valley or its consultant to approve seeding plans, including exemptions from ground disturbance in areas where appropriate to minimize erosion of existing soils. Although the Reclamation Plan omitted vegetation of the cut slope of the road, Hidden Valley is encouraged to do such vegetation if it will enhance slope stability and protect against erosion on the road, which is subject to the reclamation plan and ongoing monitoring.

3. The revegetation of the fill slopes will be included under the existing surety. The present Phase I surety is adequate. Hidden Valley is not required to revise the amount of its Phase I surety.

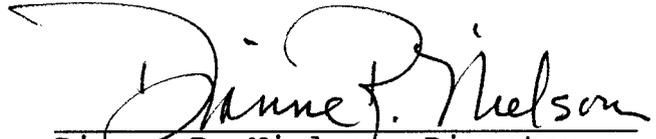
4. The required plan will be submitted to the Division within 30 days of the issuance of this order. The Division will extend the abatement period for the completion of seeding as needed to provide for seeding at the earliest favorable time.

5. The finalized assessment, resulting from the Assessment Conference of December 20, 1991, is due and payable to the Division 30 days from the date of this Order.

6. The Petitioner may appeal to the Board of Oil, Gas and Mining the informal determination of fact of violation and/or finalized assessment by filling said appeal within 30 days of the

date of this Order, in accordance with statutory and regulatory requirements, including placing the assessed civil penalty in escrow.

SO DETERMINED AND ORDERED this 17th day of January, 1992.

  
Dianne R. Nielson, Director  
Division of Oil, Gas and Mining  
State of Utah

**CERTIFICATE OF MAILING**

I hereby certify that I caused a true and correct copy of the foregoing FINDINGS, CONCLUSIONS AND ORDER for Cause No. ACT/015/007 to be mailed by certified mail, postage prepaid, the 24th day of January, 1992 to:

Joe Jarvis  
865 So Cedar Knolls West  
Cedar City, Utah 84720

Karla Knoop  
712 Castle Gate  
Helper, Utah 84526

Kim A. Kubota

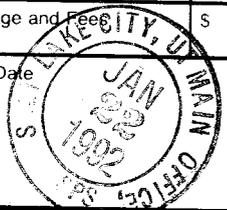
P 074 979 739

**RECEIPT FOR CERTIFIED MAIL**

NO INSURANCE COVERAGE PROVIDED  
NOT FOR INTERNATIONAL MAIL  
(See Reverse)

Sent to Joe Jarvis	
<del>JBR Consultants</del>	
Street and No. Ste 209, 1952 E Fort Union Blvd	
P.O., State and ZIP Code SLC UT 84121	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	

DEAN WK ACT/015/007



PS Form 3800, June 1985

P 074 979 740

**RECEIPT FOR CERTIFIED MAIL**

NO INSURANCE COVERAGE PROVIDED  
NOT FOR INTERNATIONAL MAIL  
(See Reverse)

Sent to Karla Knoop	
<del>JBR Consultants</del>	
Street and No. Ste 209, 1952 E Fort Union	
P.O., State and ZIP Code SLC UT 84121	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	

WK ACT/015/007 DEAN



PS Form 3800, June 1985

Fold at line over top of envelope to the right of the return address.

**CERTIFICATE OF MAILING**

I hereby certify that I caused a true and correct copy of the foregoing FINDINGS, CONCLUSIONS AND ORDER for Cause No. ACT/015/007 to be mailed by certified mail, postage prepaid, the 24th day of January, 1992 to:

Joe Jarvis  
865 So Cedar Knolls West  
Cedar City, Utah 84720

Karla Knoop  
712 Castle Gate  
Helper, Utah 84526

Kim A. Kubota

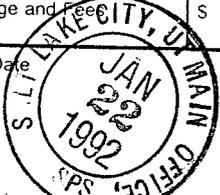
P 074 979 739

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Sent to <b>Joe Jarvis</b>	
<b>JBR Consultants</b>	
Street and No. <b>Ste 209, 1952 E Fort Union Blvd</b>	
P.O., State and ZIP Code <b>SLC UT 84121</b>	
Postage	S
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	S
Postmark or Date	

DGM  
 WK  
 ACT/015/007



P 074 979 740

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(See Reverse)

Sent to <b>Karla Knoop</b>	
<b>JBR Consultants</b>	
Street and No. <b>Ste 209, 1952 E Fort Union</b>	
P.O., State and ZIP Code <b>SLC UT 84121</b>	
Postage	S
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	S
Postmark or Date	

WK  
 ACT/015/007  
 DGM



PS Form 3800, June 1985

PS Form 3800, June 1985

Fold at line over top of envelope to the right of the return address.

CERTIFICATE OF MAILING

I hereby certify that I caused a true and correct copy of the foregoing FINDINGS, CONCLUSIONS AND ORDER for Cause No. ACT/015/007 to be mailed by certified mail, postage prepaid, the 22nd day of January, 1992 to:

Lee Edmonson  
Hidden Valley Coal Company  
1801 East University Drive  
Phoenix, Arizona 85034

Denise Dragoo  
Fabian and Clendenin  
215 South State  
Salt Lake City, Utah 84111

Joe Jarvis  
JBR Consultants  
Suite 209  
1952 East Fort Union Boulevard  
Salt Lake City, Utah 84121

Karla Knoop  
JBR Consultants  
Suite 209  
1952 East Fort Union Boulevard  
Salt Lake City, Utah 84121

Kim A. Kubota

P 074 979 742

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED  
NOT FOR INTERNATIONAL MAIL  
(See Reverse)

Sent to <b>Joe Jarvis</b>	
Street and No. <b>865 So Cedar Knolls West</b>	
P.O. <b>Cedar City UT 84720</b>	
Postage	\$ <b>75</b>
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	

DBGU VL ACT/015/007

PS Form 3800, June 1985

**SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.  
Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1.  Show to whom delivered, date, and addressee's address. 2.  Restricted Delivery (Extra charge)

3. Article Addressed to:  
**Joe Jarvis**  
**865 So Cedar Knolls West**  
**Cedar City UT 84720**

4. Article Number  
**P 074 979 742**

Type of Service:  
 Registered  Insured  
 Certified  COD  
 Express Mail  Return Receipt for Merchandise

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature - Address  
**X**

6. Signature - Agent  
**X**

7. Date of Delivery  
**1/27/88**

8. Addressee's Address (ONLY if requested and fee paid)

PS Form 3811, Mar. 1988 \* U.S.G.P.O. 1988-212-865 DOMESTIC RETURN RECEIPT  
VL ACT/015/007

P 074 979 738

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED  
NOT FOR INTERNATIONAL MAIL  
(See Reverse)

Sent to <b>Denise Dragoo</b>	
Street and No. <b>Fabian and Clendenin</b>	
215 So State	
P.O., State and ZIP Code <b>SLC UT 84111</b>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	

DBGU VL ACT/015/007

PS Form 3800, June 1985

**SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.  
Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1.  Show to whom delivered, date, and addressee's address. 2.  Restricted Delivery (Extra charge)

3. Article Addressed to:  
**Denise Dragoo**  
**Fabian and Clendenin**  
**215 So State**  
**SLC UT 84111**

4. Article Number  
**P 074 979 738**

Type of Service:  
 Registered  Insured  
 Certified  COD  
 Express Mail  Return Receipt for Merchandise

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature - Address  
**X**

6. Signature - Agent  
**X**

7. Date of Delivery  
**JAN 23 1988**

8. Addressee's Address (ONLY if requested and fee paid)

PS Form 3811, Mar. 1988 \* U.S.G.P.O. 1988-212-865 DOMESTIC RETURN RECEIPT  
VL ACT/015/007

Fold at line over top of envelope to the right of the return address.

P 074 979 737

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED  
NOT FOR INTERNATIONAL MAIL  
(See Reverse)

Sent to Lee Edmonson	
Hidden Valley Coal Co	
Street and No. 1801 East University Dr	
P.O., State and ZIP Code Phoenix AZ 85034	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	SALT LAKE CITY, UT JAN 24 1992 USPS 84303

PS Form 3800, June 1985

DEAN VL ACT/015/007

Fold at line over top of envelope to the right of the return address.

VL ACT/015/007

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. <input type="checkbox"/> Show to whom delivered, date, and addressee's address. (Extra charge)		2. <input type="checkbox"/> Restricted Delivery (Extra charge)	
3. Article Addressed to: Lee Edmonson Hidden Valley Coal Company 1801 East University Drive Phoenix AZ 85034		4. Article Number P 014 919 737	
5. Signature - Address X <i>Marilyn Wilson</i>		Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input checked="" type="checkbox"/> Return Receipt for Merchandise	
		Always obtain signature of addressee or agent and DATE DELIVERED.	
6. Signature - Agent X		8. Addressee's Address (ONLY if requested and fee paid)	
7. Date of Delivery 1-24-92			

PS Form 3811, Mar. 1988 \* U.S.G.P.O. 1988-212-865 DOMESTIC RETURN RECEIPT

P 074 979 743

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED  
NOT FOR INTERNATIONAL MAIL  
(See Reverse)

Sent to Karla Koop	
Street and No. 712 Castle Gate	
P.O., State and ZIP Code Helper UT 84526	
Postage	\$ 75
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	SALT LAKE CITY, UT JAN 24 1992 USPS 84303

PS Form 3800, June 1985

DEAN VL ACT/015/007

VL ACT/015/007

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. <input type="checkbox"/> Show to whom delivered, date, and addressee's address. (Extra charge)		2. <input type="checkbox"/> Restricted Delivery (Extra charge)	
3. Article Addressed to: Karla Koop. 712 Castle Gate Helper UT 84526		4. Article Number P 014 919 743	
5. Signature - Address X <i>Karla D Koop</i>		Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input checked="" type="checkbox"/> Return Receipt for Merchandise	
		Always obtain signature of addressee or agent and DATE DELIVERED.	
6. Signature - Agent X		8. Addressee's Address (ONLY if requested and fee paid)	
7. Date of Delivery 1-25-92			

PS Form 3811, Mar. 1988 \* U.S.G.P.O. 1988-212-865 DOMESTIC RETURN RECEIPT