



September 25, 1992

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DIVISION OF  
OIL GAS & MINING

Dr. Diane R. Nielson, Director  
Utah Division of Oil Gas & Mining  
3 Triad Center, Suite 350  
355 W. North Temple  
Salt Lake City, Utah 84180

Re: **Division Order DO-92A**  
**Hidden Valley Mine**

Dear Dr. Nielson:

This letter is responsive to the above cited Division Order and amends previous submittals made on this matter. The Division staff's position, that seeding a small area adjacent to Ivie Creek will extend the liability period for the site, has necessitated this change in our submittal.

The letter submittal from Denise Dragoo, Esq. to Ms. Pamela Grubaugh-Littig dated August 24, 1992 is hereby rescinded and the following submittal is provided in its place:

1. **Revision of the Reclamation Plan:** Page 34 of the reclamation plan will be revised by inserting the following paragraph above section UMC 784.14c:

**Runoff water produced on the out slopes of the A- and B-Seam pads will be minimal. Treatment of that runoff will be accomplished by filtration and deposition of sediments within the coarse rock piles at the base of these areas, thereby preventing degradation of water quality in Ivie Creek.**

Page 64 of the reclamation plan will be revised by replacing the last sentence with the following:

**Within the buffer zone, the following reclamation activities will occur:**

1. **Removal of culverts that empty into the creek and the subsequent restoration of channel discharges;**

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The effect of this change in our submittal is to remove new seeding from our plan of compliance in response to the Division Order and staff comments. The Division Order itself does not require that new seeding occur adjacent to Ivie Creek, only that we recognize the Stream Buffer Zone variance that was granted to Hidden Valley Coal Company on May 2, 1980 for a road that no longer exists. If it were not for the Division staff's position that hand seeding the small area next to Ivie Creek will reset the liability clock, we would not be at all reluctant to perform this type of work in the interest of cooperation and site enhancement.

We believe that this submittal addresses the alleged permit deficiency completely and complies with the intent and content of DO-92A.

Please call me if you need additional clarification.

Sincerely,

HIDDEN VALLEY COAL COMPANY



Lee Edmonson, Manager  
Planning and Regulatory Affairs

LE/cn

cc: Denise Dragoo, Esq.  
Pamela Grubaugh-Littig  
Karla Knoop, JBR

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the upstream side of the fence, at the top of the fence only. This protects the integrity of the silt fence fabric. The lower edge of the silt fence fabric is to be buried at the base of the fence to a depth of at least 6 inches.

- 4) The ends of the silt fence are to be enclosed in an adjacent berm to ensure that no runoff is allowed to bypass the silt fence.

Runoff water produced on the outslopes of the A- and B-Seam pads will be minimal. Treatment of that runoff will be accomplished by filtration and deposition of sediments within the coarse rock piles at the base of these areas, thereby preventing degradation of water quality in Ivie Creek.

UMC 784.14 c Reclamation Plant: Protection of Hydrologic Balance  
Probable Hydrologic Consequences Assessment  
for the  
Hidden Valley Mine

#### 1.0 Introduction

The purpose of this section is to address the requirement raised in the State of Utah, Department of Natural Resources, Division of Oil, Gas, and Mining (DOG M) regulations, UMC 784.14 (c), requiring that the operator of an underground coal mine address

(Revised 9-25-92)

UMC 817.57 Hydrologic Balance: Stream Buffer Zones

The ephemeral stream channels disturbed during reclamation will be stabilized in a 2h:1v or 4h:1v sideslope configuration. Silt fences as shown in Plate V will aid in control of sediments from surface flows until revegetation adequately stabilizes the ground surface. The small berm and silt fences adjacent to Ivie Creek will remain throughout monitoring. Within the buffer zone, the following reclamation activities will occur:

- 1. Removal of culverts that empty into the creek and the subsequent restoration of channel discharges;**