

0014



State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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Mine file

July 29, 1994

Lee Edmonson, Properties Division
Cal Mat Company
1801 University Drive
Phoenix, Arizona 84034

Re: Hidden Valley, July 21, 1994 Meeting Follow-Up, ACT/015/007, Folder #5,
Emery County, Utah

Dear Mr. Edmonson:

I am writing to follow up on our meeting on the Hidden Valley Mine held July 21, 1994. I want to thank you for inviting Ed Settle of Consolidated Coal Company to the meeting, and appreciate the comments and contributions he made to the success of the meeting.

I appreciate your agreeing in principle to the 18 issues discussed and noted in the attached minutes. I also appreciate your willingness to jointly commit to an action plan on issues including back-filling and grading, roads and wells, signs and markers, vegetation, and updating the mining and reclamation plan on some pending items. While issues concerning runoff control, erosion and sediment control, and bond clock were discussed, the first two will need to be revisited from time to time to determine if control measures are meeting our joint goals of bond release and are meeting compliance requirements. Further, a technical meeting of the minds on practical methods for collecting defensible data on the sediment control component of Phase II bond release needs to be reached. Please consult with Daron Haddock and Tom Munson of my staff for their suggestions and assistance in that regard.

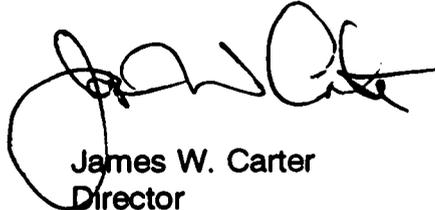
While the bond clock remains an issue, this action plan and other new initiatives, if approved, together with the husbandry practice rules now in the process of approval, will provide a better understanding of where and how this issue may evolve.

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Lee Edmonson
July 29, 1994

It is my opinion we all left the meeting with a better appreciation of the constraints which face us. It is important that we collectively recognize the adverse implications of conflicting technical data. In this instance, because of the nature of some issues, I believe we cannot do alone what we can do together. We are committed to a joint endeavor if we are to resolve some of the more difficult issues. However, with our limited staff and budget, this cannot be our normal style of operation or we could not fulfill our main mission. I encourage you to take care of the paperwork and the field work on those items listed in the minutes. The urgency of those items is related to compliance. Based on our discussions, we anticipate that you will be able to complete these items by August 15, 1994.

As we discussed, I believe our discussions and the conclusions reached at the meeting will pave the way for taking care of less complex issues that are potential compliance issues, and refining and carrying out an action plan for the more complex technical issues. Thanks for your participation and your willingness to explore new initiatives in order to achieve successful reclamation at the Hidden Valley Mine. As noted below, I am providing a copy of this letter and attachments to Mr. Settle.

Very truly yours,



James W. Carter
Director

vb
Attachments
cc: E. Settle
HIDDENVA.HID

Hidden Valley Meeting Summary and Conclusion

Date of Meeting: July 21, 1994

Where Held: Division of Oil, Gas, and Mining Office, SLC UT

Who Attended: Cal Mat, Lee Edmonson
Consolidated Coal, Ed Settle
JBR Associates, Karla Knoop, Joe Jarvis
DOGM: Jim Carter, Lowell Braxton, Joe Helfrich,
Daron Haddock, and Bill Malencik.

Goal Meeting:

- Prior to meeting, issues were identified and reduced to writing and exchange with principle parties.
- Discuss issues and reach a consensus or non-consensus ^{on} of 18 specific issues that fit into seven categories.
- Discuss and formulate action plan to address issues.

Meeting Summary & Conclusions:

- Item 1: Eighteen specific issues listed on document titled Attachment I attached hereto were concluded as consensus issues.
- Item 2: Issues relating to backfilling and grading, roads and wells, signs and markers, and vegetation (issue categories I, II, III, and IV) are going to be included in an action plan to be prepared and submitted by the permittee. Included is the joint field trip to analyze existing reference area including the need for and observe alternatives proposed reference sites that are representative of the pre-disturbed mine site.
- Item 3: New initiatives on vegetation.
- Item 4: Compliance issues that need attention
 - (a) update map, include silt fence that provides sediment control on the borrow area.
 - (b) update map on buffer zone and disturbed area including reclaimed road outslope.
 - (c) relocate disturbed markers and buffer zone signs.

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Summary and Conclusions
July 21, 1994

- (d) final design on seven diversions, five of which were issues associated with a federal TDN, ~~with appropriate~~
- (e) incorporate items a, b, and d into amendments to the Hidden Valley Mining and Reclamation Plan.

revisiting
Follow up: ←

~~Tentative Action Schedule~~ *from 7-21 meeting:*

Item 2: August 15, 1994

Item 3: August 31, 1994

Item 4: August 15, 1994

Next
Follow-up Meeting:

Middle September - exact date dependent on progress of Item 3 and other considerations.

Should the summary not reflect your understanding of the conclusion, please phone me with your concerns, if any.

WJM:sd
Enclosure

ATTACHMENT I**Division of Oil, Gas and Mining****Hidden Valley Mine Issues Relating to Compliance and/or Bond Release Matters**

- I. **Backfilling and Grading**
 - 1) **Highwalls, A & B Seams**
 - 2) **Approximate Original Contour, Cutslope Road**
 - 3) **Reclaimed Road Bed**

- II. **Roads/Wells**
 - 4) **Roads to Seven Wells/Wells**
 - 5) **Public Vehicle Encroachment on Reclaimed Road**

- III. **Signs and Markers**
 - 6) **All Disturbed Areas Not Properly Marked, Maps Do Not Properly Depict Disturbed Areas**
 - 7) **Buffer Zone Areas Not Properly Marked**

- IV. **Vegetation**
 - 8) **All Disturbed Areas Not Seeded and Mulched**
 - 9) **Seeded Areas Show Poor Vegetal Establishment**
 - 10) **Division Provide Policy to Permittee in Writing Prior to Joint Meeting on How Vegetation Parameters Will be Measured and Quantified as Related to Phase II Bond Release and Compliance**
 - 11) **Poisonous Plant Establishment on Reclaimed Site**
 - 12) **With Xerophytic Environment, et al., Will Vegetation Provide Adequate Erosion Control/Sediment Control, Phase II Bond Release Parameters? If Not, Then What?**

- V. **Runoff Control**
 - 13) **Undisturbed Runoff Interfacing With Disturbed Runoff**
 - 14) **Water Bars**

- VI. **Erosion and Sediment Control**
 - 15) **Road Outslope**
 - 16) **A & B Seam**
 - 17) **Borrow/Staging Area**

- VII. **Bond Clock**
 - 18) **Further Reclamation Work That Will Start Bond Clock**