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

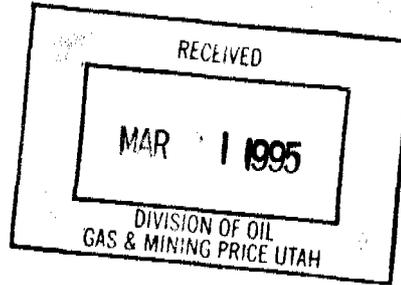
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*mine file
permit*

March 2, 1995

Lee Edmonson
Cal Mat Company
Properties Division
1801 East University Drive
Phoenix, AZ 85034



RE: Hydrology issues, Hidden Valley Coal Company, Hidden Valley Mine, ACT/015/007, Folder #2, Emery County, Utah

Mr. Edmonson:

You may be aware that Tom Munson, Reclamation Hydrologist, recently left the coal regulatory program to work in our minerals program. Before he left I asked him to provide his insight into any hydrology related issues that may need to be resolved at the Hidden Valley Mine. The enclosed memo discusses the importance of documenting stability of the site and is provided for your information and as a recommendation. Please review it carefully. We encourage you to collect the information described so that you will have adequate supporting documentation for bond release.

Please call if you have any questions.

Sincerely,

Daron R. Haddock
Permit Supervisor

enclosure:

cc: W. Malencik
K. Knoop
P. Grubaugh-Littig
hydrissu.hid



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February 28, 1995

Memo to: Daron Haddock

Memo from: Tom Munson

RE: Hidden Valley Mine Hydrology Issues, Hidden Valley Coal Company, Hidden Valley Mine, ACT/015/007, Folder #2, Emery County, Utah.

Synopsis

The purpose of this memo is help describe what are outstanding unresolved issues regarding the Hidden Valley Mine Property related to Bond release and Hydrology.

Analysis

It is apparent that the Hidden valley Mine is located in a highly erosive environment, making bond release under the stringent requirements of the coal program difficult at best. Such terminology as "enough vegetation to control erosion" does not equate in this environment of 10 percent cover. Therefore, the permittee has to be creative and imaginative in collecting data from the area regarding background geomorphic characteristics, sediment and erosion rates, and any other pertinent data to support claims regarding stability of the site and bond release.

Other coal operations have used computer models (SEDCAD), site-specific inspection reports, and actual data on erosion off-site versus on-site to support claims of stability. At this point in time, I have suggested, but have not seen the operator attempt to collect any information regarding this issue. Maintenance of erosion has been a past enforcement issue and it seems appropriate to expect the operator to collect information in this regards.



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Hydrology Issues
ACT/015/007

Recommendations

I strongly recommend that the operator start collecting information on background erosion and its impacts on vegetation and overall stability of the site. This information will be part of the stability determination the Division will have to make to grant bond release. Without supporting information over a period of years indicating trends, a call of this nature is difficult to make.

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