



United States Department of the Interior
 OFFICE OF SURFACE MINING
 Reclamation and Enforcement
 BROOKS TOWERS
 1020 15TH STREET
 DENVER, COLORADO 80202

NOV 2 7 1984

Betty
 Big Mine file
 cc D Nielson

ACI/015/009
 #2

RECEIVED

NOV 29 1984

DIVISION OF
 OIL, GAS & MINING

Mr. Ronald W. Daniels, Acting Administrator
 Mineral Resource Development and Reclamation Program
 Division of Oil, Gas and Mining
 355 West North Temple
 3 Triad Center, Suite 350
 Salt Lake City, Utah 84180-1203

Dear Mr. Daniels:

The Office of Surface Mining (OSM), Western Technical Center staff has reviewed your November 2, 1984 submittal regarding deficiencies in the Mining and Reclamation plan for the Trail Mountain Mine. Your letter identified four deficiencies in the application and decision document material. OSM's response to each of your concerns is as follows:

1. Ground-water information and protection of the hydrologic balance.

The Division's purpose of characterizing the Star Point-Blackhawk regional aquifer, including whether or not it exists, is a positive information gathering step in terms of understanding the role of such an aquifer system in a regional sense. Imposing such characterization upon the Trail Mountain Mine in the form of a condition to their present permit application is not necessary because no aquifer system is encountered by mining at Trail Mountain. The potential impacts to ground water at the Trail Mountain Mine have been assessed in the decision document, and the Cumulative Hydrologic Impact Analysis report for the Cottonwood Basin. The probable hydrologic consequences analysis is supported by empirical data provided by the applicant. No aquifer impact is anticipated by the present and proposed operations because no aquifer is intercepted, the mine is essentially dry, and only two years of mining remains for the life of mine as currently proposed.

Based on our analysis and the resulting finding of no material damage to the hydrologic balance, we believe that a condition to construct one or more boreholes to delineate and monitor an aquifer system which is not intercepted and impacted at the Trail Mountain Mine, is beyond the requirements of the Surface Mining Control and Reclamation Act and other Federal requisites. Therefore, we have not added such a condition to the Federal permit. Under the authority of State legislation and executive directives, the Division may add such a condition to the state permit.

2. Operation plan: maps and plans.

The Division proposes that explosives storage and handling facilities be shown of Figure 3-1, "Surface Facilities Map." OSM's copy of Figure 3-1 is

titled, "Trail Mountain Minesite Surface Area." Figure 3-5 bears the title "Surface Structures," and the required explosives facilities are clearly indicated on this map. We feel that Figure 3-5 is adequate for the requirements of UMC 784.23 relative to explosives facilities.

3. Contemporaneous reclamation.

Because of the limited extent of surface facilities associated with underground mining, OSM does not discuss the requirements of the contemporaneous reclamation regulation as a separate entity in the decision document. Contemporaneous reclamation requirements in general are discussed in the Vegetative Resources section of the environmental analysis (p. 12), the Backfilling and Grading section of the technical analysis (pp. 35-37), and the Revegetation section of the technical analysis (p. 41). Plans and commitments are provided by the applicant on pages 3-61 through 3-61C of the permit application package.

4. Revegetation: standards of success and tree and shrub stocking.

In response to the Division's deficiencies, the applicant submitted revised pages to the Reclamation section of the permit application. This revision brings the applicant into compliance with the requirements of the Division's success standards.

If you have any questions regarding our response to the Division's deficiencies, please call Louis Hamm or Walter Swain at (303) 844-3806.

Sincerely,



Allen D. Klein
Administrator
Western Technical Center

cc: Robert Hagen, OSM - Albuquerque
Dianne Nielson, DOGM
Mary Boucek, DOGM