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STATE OF UTAH  
NATURAL RESOURCES  
Oil, Gas & Mining

Scott M. Matheson, Governor  
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May 14, 1984

Mr. Allen D. Klein, Administrator  
Western Technical Center  
Office of Surface Mining  
Brooks Towers  
1020 Fifteenth Street  
Denver, Colorado 80202

ATTENTION: Mr. Lou Hamm

Dear Mr. <sup>Allen</sup>Klein:

RE: Draft Technical Analysis, Diamond Shamrock Corporation  
Trail Mountain Mine, ACT/015/009, Folder No. 2, Emery County,  
Utah

The Division technical staff has conducted a review of the Draft Technical Analysis for the above-referenced Mining and Reclamation Plan (Permit Application Package) which was received by the Division April 20, 1984. As per recent telephone conversations between Lou Hamm, CSM, and Mary Boucek, DOGM, the Division is enclosing an annotated copy of the draft document which contains editorial and technical comments and questions for your consideration.

In addition to the annotated comments, the Division has several major areas of concern regarding this document which warrant additional consideration and are outlined below.

1. Format--The format of the document is very difficult to follow, particularly regarding which sections are in compliance, which are not in compliance and what conditions apply to which sections.
2. Bond--A detailed breakdown of the bond analysis should be included as part of the Technical Analysis package. In addition, it should be noted that the bond must ultimately be reviewed and approved by the Division.

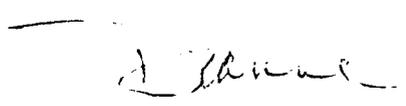
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3. Revegetation Success Standards--The applicant's proposal, and acceptance thereof as outlined in the compliance section, to reestablish woody plant density to 70 percent of that in the related reference area is not acceptable under the Utah program. A careful review of UMC 817.116 and 817.117 reveals that, where postmining land-use is proposed to be wildlife habitat, density (woody plant) must be equal to or greater than 90 percent of the stocking of woody plants of the same life form on the reference area. Therefore, the applicant's proposal must be amended to reflect the acceptable success standard. Compliance cannot be achieved until this is done.
4. Backfilling and Grading--The backfilling and grading section of the document, under the compliance discussion, neglects to discuss the adequacy of the applicant's proposal with reference to the actual engineering aspects of reclamation. This must be addressed before a complete compliance determination can be made.

Due to prior commitments on the part of the staff's hydrologists, specific review of hydrological portions of the draft document has not been conducted at this time. When the next draft of the document has been prepared, the Division would again appreciate the opportunity to review it, especially from a hydrology perspective.

Should you have any questions, please contact the Division at your earliest convenience. Thank you for the opportunity to review this document.

Best Regards,

  
Dianne R. Nielson  
Director

DRN/mmb:btb  
Enclosures

cc: J. Smith  
E. Hooper  
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