



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



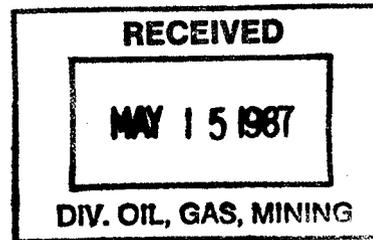
In Reply Refer To:

1546M

May 13, 1987

4441  
 UT-0017

Dr. Dianne Nielson, Director  
 Utah Division of Oil, Gas and Mining  
 355 West North Temple  
 3 Triad Center, Suite 350  
 Salt Lake City, Utah 84180-1203



Dear Dr. Nielson:

The Federal Programs Division (FPD) has received the enclosed mid-term review comments from the Albuquerque Field Office (AFO) and from the U.S. Forest Service Manti-LaSal National Forest (USFS). Their comments reflect a review of the inspection and enforcement record and the land management agency responsibilities, respectively, for Trail Mountain Coal Company's Trail Mountain Mine (UT-0017). The Bureau of Land Management in Price, Utah called FPD on April 14, 1987, to inform us that their review did not reveal any concerns for matters under their jurisdiction. FPD's concerns were recently communicated to Utah Division of Oil, Gas and Mining (DOGM) in completing the Tract 2 permitting action. That review indicated that permit condition #1 was never responded to and must be addressed; that permit condition #2 was adequately addressed; that permit conditions #3 and #4 and the USFS condition are ongoing conditions and should remain in effect.

The AFO letter addresses problems that are mainly compliance issues. The disposal of waste oil products on coal piles and the failure of Trail Mountain Coal Company to properly dispose of toxic materials retrieved from sedimentation ponds are issues that should be promptly corrected to comply with the permit and the Utah State program. Changes in the water monitoring program and wildlife monitoring program may be requested by the applicant or required as a reasonable revision by Utah DOGM. Utah DOGM should process such changes in accordance with the Utah State program and cooperative agreement.

The USFS comments should be considered in Utah DOGM's mid-term review. Resolution of the USFS concerns should be discussed in the final mid-term review documentation that will be transmitted to all Federal agencies with an interest in the mine.

If you have any questions regarding this synopsis, please contact Vernon Maldonado or Richard Holbrook at (303) 844-2451.

Sincerely,

*Ramvir Singh*  
for Peter A. Rutledge, Chief  
Division of Federal Programs

Enclosures

cc: Bob Hagen - AFO  
Reed Christensen - USFS, Manti-LaSal



United States Department of the Interior

OFFICE OF SURFACE MINING  
RECLAMATION AND ENFORCEMENT

219 CENTRAL AVENUE, NW  
ALBUQUERQUE, NEW MEXICO 87102

APR 30 1986

In Reply  
Refer to:  
4480  
SFP

MAY 15 1987

DIV. OIL, GAS, MINING

Memorandum

TO: Peter Rutledge, Chief  
Division of Federal Programs

FROM: *[Signature]* Robert H. Hagen, Director  
Albuquerque Field Office

SUBJECT: Midterm Review of Trail Mountain, UT-017

In response to a memo dated March 31, 1987, from Richard Holbrook, requesting assistance for a midterm permit review of the Diamond Shamrock Coal Company's Trail Mountain Mine, the Albuquerque Field Office (AFO) has conducted a thorough review of the inspection file. Results of the review indicate that the permittee is generally in compliance with his approved mine reclamation plan (MRP), but the permittee has not properly implemented several permitting requirements.

Recent inspections conducted by the Utah Division of Oil, Gas and Mining (DOGM) indicate that, according to the permit, waste oil was to be trucked from the site via Amsworth Trucking Company to an approved disposal site. According to DOGM inspection reports, this practice is not being followed. Apparently, the operator now places this oil on his coal stockpiles. AFO requests Western Field Operations (WFO) input on the possibility of environmental consequences of this practice. If there are no problems, the operator should be required to amend his permit to reflect this new disposal method.

A second waste disposal problem has been observed by DOGM inspectors: sediment pond slimes dredged from the pond are required to be handled as toxic materials because the slimes contain coal fines and waste oil.

Mr. Peter Rutledge

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Currently, the operator has stacked these dredged materials adjacent to the sediment pond rather than dispose of the material off-site in approved toxic waste disposal sites. AFO requests that WFO review the DOGM determination that these slimes should be considered toxic materials to be disposed of in toxic waste disposal sites, and amend the permit as appropriate.

A change to the permit is apparently needed relative to the required invertebrate studies conducted adjacent to the mine on Cottonwood Creek. The permittee may request the sampling frequency to be decreased to biannual sampling and relocation of one sampling station.

One surface water monitoring site (SW-4) for high and low flows appears to be superfluous; AFO recommends its deletion if it is not needed.

Please contact John C. Kathmann at FTS-474-6515 if there are any questions.

*FTS 474-1486*

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