



0024
 STATE OF UTAH
 NATURAL RESOURCES
 Oil, Gas & Mining

Index to Responses

from BCC 2/26/88

file AUI/015/009 #2

Norman H. Bangerter, Governor
 Dee C. Hansen, Executive Director
 Dianne R. Nielson, Ph.D., Division Director

355 W. North Temple • 3 Triad Center • Suite 350 • Salt Lake City, UT 84180-1203 • 801-538-5340

August 18, 1987

Mr. Allen Childs
 Mine Engineer
 Trail Mountain Coal Company
 P. O. Box 550
 Orangeville, Utah 84537

Allen
 Dear Mr. Childs:

Re: Mid-Term Review, Trail Mountain Coal Company, Trail Mountain Mine, ACT/015/009, Folder #2, Emery County, Utah

Attached are the items which must be addressed for the Mid-Term Permit Review for the Trail Mountain Mine. In addition to the specific items attached, two other significant items must be addressed as follows.

1. Permit Transfer - Due to the recent acquisition of Trail Mountain Coal Company by Arch Minerals, a formal permit transfer must be undertaken. Please note the requirements of UMC 788.17 and 788.18 for the specific requirements which must be addressed.
 Submitted - Chapter 2, Appendix
2. Mine Plan Consolidation - The recent approval of the Tract 2 lease has resulted in a substantial amount of materials in the Tract 1 PAP being outdated or superceded. These two portions of what is now the approved PAP for the Trail Mountain Mine must be consolidated and all dated or superceded materials removed.
 Forthcoming

Attached are letters from the Office of Surface Mining and the U.S. Forest Service which raise concerns to also be addressed in your response to this letter.

Page 2
Mr. Allen Childs
ACT/015/009
August 18, 1987

Thank you for your cooperation in this matter. Would you please have 14 copies of your response to all items to the Division offices no later than October 16, 1987.

Sincerely,



Lowell P. Braxton
Administrator
Mineral Resource Development
and Reclamation Program

JJW/djh
Attachments
cc: P. Rutledge, OSMRE
Tech Review Team
1266R/1

ATTACHMENT "A"

UMC 771.23(b) and 784.23(b) (PGL)

Figures 3-1 and 3-5 received 3/22/85) must be updated to accurately reflect the on-site surface facilities as they exist today.

New Figures 3-1, 3-5

UMC 782.13(a)(2) (PGL)

The owners of record of the surface area and of coal rights must be updated, if necessary. Chapter 2, Page 2-1

UMC 782.13(b)(1) (PGL)

The officers and directors of the applicant must be updated.

Chapter 3, page 2-3

UMC 782.13(b)(2) (PGL)

The principal shareholder of the applicant must be updated.

Chapter 2 - Page 2-4

UMC 782.13(c) (PGL)

The owners of record of surface and subsurface areas contiguous to the permit must be updated, if necessary. Chapter 2, Page 2-6

UMC 783.19 Vegetation Information (KMM)

Page 9-37 indicates that Threatened and Endangered plants are not known in the mine plan area. Please update this section with a brief discussion of Hedysarum occidentale var canone, which is known from the vicinity of the mine plan area (Miller Canyon, on UP&L property). Bob Thompson, USFS, can provide the necessary information on its status in your permit area. Chapter 9, Page 9-37

UMC 784.11 (PGL)

The plan mentioned on page 3-11a as Figure 3-6 is missing. Please submit. See Figure 3-6

UMC 784.13(b)(2) (PGL)

An updated reclamation cost estimate may be submitted with this mid-term review if Trail Mountain Coal Company desires. N/A

UMC 784.17 Protection of Public Parks and Historical Places (KMM)

Page 3-29 indicates that future development of the access road will impact cultural resources. Since the access road has already been developed, please revise the text to indicate this construction and what, if anything, happened to the cultural resources.

Chapter 3 page 3-29

UMC 784.21 Fish and Wildlife Plan (KMM)

Page 3-44 discusses a decrease in the macroinvertebrate population of Cottonwood Creek from above to below the mine; page 3-48/9 indicates that there will be an impact of mining on microinvertebrates; page 3-52/3 indicates that the creek will be culverted; and the Division received a copy of a letter dated 11/25/86 from DWR indicating that invertebrate sampling of Cottonwood Creek could be discontinued.

Please revise this section of the PAP to indicate current status of the creek, its culverts, its macroinvertebrate population, the impacts of the mining on the creek, mitigation measures you have or will institute and the status of your monitoring program, including pertinent correspondence as necessary. Chapter 3, pages 44, 49, & 52-53 Appendix 10-8, Appendix 7-13.3, Chapter 9 page 37A
UMC 784.23(b)(1) and (b)(5) (PGL)

Fencing and topsoil sites should be shown on the surface facilities map. The fencing mentioned on page 3-21b must include all fencing on the property. Chapter 3, page 3-21b

UMC 784.23(b)(4) (PGL)

The coal yard described on page 3-11 was never developed; please update the PAP to reflect this. Chapter 3, page 3-11

UMC 784.26 Air Pollution Control Plan (KMM)

Page 4-9 indicates that roads are watered for dust suppression. Please revise this section discussing the new road pavement, coal yard sprinklers and any other modifications of your air pollution control plan. Chapter 4, page 9

UMC 817.11(c)(2)

The signs portrayed on page 3-22 are not correct as shown. Please correct and update. Chapter 3, page 3-22

UMC 817.21-.26 (DD)

On June 12, 1987, Trail Mountain Coal Company submitted an acceptable sampling program to assess if salinity is a problem with the existing pad materials which are proposed to be used for final reclamation. The sampling will occur after backfilling and grading operations are completed and before final reclamation.

In order to fully address the implications of the sampling program, soil analysis of the test plot area must be undertaken as well. This will allow correlation of test plot revegetation success with soil chemical and physical characteristics, and validate test plot results with the reasoning behind OSM Condition #1. Please submit a sampling program and data collected to date on the test plot, including a summary of any conclusions or findings..

Appendix 9-A (update) page 1-35

UMC 817.41-.46 Hydrologic Balance: General Requirements (JRF)

The PAP discusses the ground-water regime in Section 7.1. Due to recent studies (Lines, 1981), the operator should modify portions of the text that refer to the impermeability of the Blackhawk Formation and Starpoint Sandstone. Additionally, the PAP should reflect the current ground-water regime; including but not limited to the following:

- o Recent spring and seep survey maps and information
- o Modify text in Section 7.1 to reflect recent research performed on aquifer characteristics.
- o Modify the well discussion to include the monitor well in the mine yard, UP&L well, and the new water well.
- o The water rights section should be changed according to recent Forest Service comments.
- o The PAP should incorporate recent data and information that were derived for the Tract 2 permit into one comprehensive PAP. Mine Plan Consolidation/Forthcoming

Diversions

The sizing of the Cottonwood Creek channel at the outlet of the main bypass culvert must adequately pass the design event. Please submit calculations which document that the present configuration is adequate. Appendix 7-30

Sediment Control Plan

All figures (7-11, 7-12) and verbage in the PAP must reflect modifications to the sediment control plan including, but not limited to, the curb and gutter modification. Information in related appendices (Ap. 7) must be modified to reflect on the ground conditions. Figures 7-11,7-12

Water Distribution Plan

The PAP should be updated with the current water distribution plan. The in-mine water discharge system has been modified since permit approval. All verbage and maps must be altered to the current system (NPDES discharge). Additionally, a current water balance of mine water inflows and total mine water requirements should be incorporated into the PAP.

Reclamation

The PAP must contain a map and organized design details on the post-mining reclamation of the drainage system. The operator should address placement of sediment barriers along the stream channels to prevent sedimentation of the surface waters. The operator proposes to use contour furrows as runoff/sedimentation controls. Recent experience has shown that contour furrows may be a reclamation liability. The operator should consider alternative runoff/sediment controls. Land roughening has proven to be effective in the coal mining regions of Utah. Appendix 9 , page 11

Probable Hydrologic Consequences

The PAP should contain the most recent PHC document. Additionally, verbage and maps should be modified to reflect the current hydrologic regime at Trail Mountain. Appendix 7-30

Waste Disposal

The PAP states that sediment pond waste will be disposed of in the mine. The operator should consult with MSHA on recent developments on waste disposal policies. Furthermore, the operator must commit to providing a plan that ensures the protection of groundwater resources during and after waste disposal.

Chapter 7, page 8
UMC 817.52 Hydrologic Balance: Surface and Ground Water
Monitoring (JRF)

The PAP should be updated to reflect all modifications and additions pertaining to ground-water monitoring. This should include, but is not limited to, the following:

- o Compilation of all (Tract 1 and 2) water quality data into one appendix.
- o Table or chart depicting sample points, sample frequencies, and chemical parameters to be analyzed.
- o Submit an accurate map depicting monitor points as of June, 1987.

The operator should incorporate all modifications to the water monitoring plan. The updated monitoring plan should reflect Tract 1 and Tract 2 monitoring schedules and parameters to be sampled. Verbage in Section 3, Section 7, and all corresponding tables and maps must be updated to the current monitoring schedule.

The PAP should contain information on the most recent spring and seep survey. The current mine plan has water quality information in Section 7 and in several appendices. Information for both Tract 1 and 2 should be incorporated into one section or appendix.

Figures (appendix - 7-16, 7-19, 7-29, 7-30)	Appendis 7-11.2 (Spring Inventory)
7-13.1 Macroinvertebrate (Intern)	7-16 Water monitoring Stations
7-13.2 (Final) - 4 -	7-16.1 Water monitoring Guidelines
7-13.3 (Discontinue Sampling)	7-21 Mine Inflows

Table 7-2 (water quality parameters) should demonstrate compliance with the Division's 1986 Water Monitoring Guidelines. Chapter 7 page 7-22

UMC 817.111 Revegetation: General (KMM)

Page 3-39 indicates that test plots will be installed. Please revise this text and Appendix 9, if necessary, to reflect what was actually done on the test plots. Chapter 3, page 39 Appendix 9-A

Please revise Figure 10-A to indicate the current status of revegetation on the mine site. Figure 10-A, page 25

UMC 817.116 Revegetation: Standards for Success (KMM)

Page 3-40 and Appendix 9, page 23, indicate that revegetation areas will be monitored annually by quantitatively sampling cover, density and production. There is no indication of where this data will be reported. This schedule includes more intensive sampling than seems necessary and, in terms of productivity, may be hazardous to the health of the revegetation. The Division recommends qualitative evaluation of revegetation each year and quantitative sampling in years 2, 3 (optional), 5, 9 and 10 of the liability period which begins when revegetation, including maintenance activities, are completed (see attached guideline). The applicant should consider revising their monitoring schedule, but must at least commit to providing data from monitoring in an annual report to be submitted to the Division by April 1 of each year.

Chapter 3, page 40 Appendix 9, pages 18-38, Appendix 9A, pages 1-17

1266R