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State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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October 12, 1988

Mr. Dan Guy, Manager
Permitting & Compliance
Beaver Creek Coal Company
P. O. Box 1378
Price, Utah 84501

Dear Mr. Guy:

Re: Review of Mid-Term Review Responses, Beaver Creek Coal Company,
Trail Mountain No. 9 Mine, ACT/015/009, Folder No. 2, Emery
County, Utah

The Division has completed review of the August 5, 1988 materials submitted by Beaver Creek Coal Company (BCCC) in response to the Division's mid-term review letter of May 27, 1988. A few items still remain which must be addressed prior to completion of the mid-term review.

Attached are the remaining deficiencies. Please feel free to contact the technical staff authoring the comments in regards to any clarifications you may need. It is imperative that BCCC respond completely and adequately to all concerns noted herein no later than October 31, 1988.

Sincerely,

Samuel P. Broughton
for

John J. Whitehead
Permit Supervisor/
Reclamation Hydrologist

djh
Attachments
cc: Tech Review Team
WP+/62

MID TERM REVIEW
TRAIL MOUNTAIN #9 MINE
ACT/015/009

Beaver Creek Coal Company
Emery County, Utah
October 12, 1988

UMC 817.21-.24 Topsoil - (BAS)

Please remove the following from the PAP:

1. Pages 17D through 17H in Appendix 9-1.
2. The last paragraph on page 20 and first paragraph on page 21 in Appendix 9-2.
3. Numbers 1 and 5 in the Discussion section under Vegetation Test Plots (Appendix 9-2, pages 22 and 23).

UMC 817.46 Hydrologic Balance: Sedimentation Ponds - (JRF)

Figure 7-13 (Sedimentation Pond Design Details) is washed out. Design information contained on the figure is difficult to read. Please submit a higher quality figure.

UMC 817.52 Hydrologic Balance: Surface and Ground Water Monitoring - (JRF)

The reformatted ground-water monitoring schedule (Appendix 7-1, Attachment VI) does not contain sample point T-19 (see Tract II approved permit Figure 7-3). Please include this point in the monitoring plan.

Miscellaneous

1. (BAS) The operator responded to all recompiled mine plan comments. However, to eliminate possible confusion regarding the status of reference areas, I recommend that section 9.3.8 text in the PAP (pages 9-35 and 9-36) be replaced with the following:

Two vegetation communities were assigned reference areas. These have been permanently marked, and are shown on Map A, Appendix 9-1. The riparian reference area represents the pre-disturbance condition of the parking area, coal loading facilities, and mine buildings area. The grassland-shrub reference area represents the pre-mining grassland-shrub community--part of which still exists above the mine mouth. Both reference areas were sampled quantitatively. Data are included in Vegetation Resources, Chapter Nine.

2. (BAS) Section 9.2.3 (page 9-2) states that reference area locations "...are marked on the vegetation map." The vegetation map should be identified as Map A, Appendix 9-1.

3. (BAS) The last remaining midterm issue involved the revision of Figure 10-A. Figure 3-16 was submitted, replacing Figure 10-A. Still needed is a reference to Figure 3-16 in the section on contemporaneous reclamation (section 3.5.1, page 3-49), directing a reader to the figure.

4. (PGL) Appendix 2 - Operation Plan for Existing Structures - was stated as "missing" in the review and has still not been submitted. The operation plan must include all the requirements for existing structures as outlined in UMC 784.12. This information must be submitted for inclusion in the recompiled PAP.