

0010

Mountain Coal Company

Trail Mountain Mine
Post Office Box 1378
Price, Utah 84501
Telephone 801 637-5050 (Price Office)
801 637-5203 (Mine Office)
801 748-2140 (Mine Site)



October 28, 1992

RECEIVED

OCT 29 1992

DIVISION OF
OIL GAS & MINING

Pamela Grubaugh-Littig
Permit Supervisor
Utah Division of Oil, Gas & Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

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

Dear Ms. Littig:

Enclosed are 3 copies of the response to the Mid-Term review for the Trail Mountain Mine.

All pages and Plates are numbered, and should replace corresponding numbers in the mine plan. Two new plates are also enclosed in map pockets for the plan. A checklist is also included to facilitate the review.

If you have any questions, or need any further information, please contact me at Mountain Coal Company or Val Payne at Pacificorp.

Respectfully,

Dan W. Guy
Manager Permitting/Compliance

cc: Dave Arnolds - MCC
Johnny Coffey - MCC
Val Payne - Pacificorp
File - #9 Mid Term Review



State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

Norman H. Bangerter
Governor

Dee C. Hansen
Executive Director

Dianne R. Nielson, Ph.D.
Division Director

355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203
801-538-5340

August 21, 1992

TO: Pamela Grubaugh-Littig, Permit Supervisor

FROM: Jess Kelley, Reclamation Engineer *JK*

RE: Midterm Review, Mountain Coal Company, Trail Mountain Mine, ACT/015/009, Folder #2, Emery County, Utah

SYNOPSIS

This writer has recently performed a midterm review of the mine plan for this site. There are a number of deficiencies.

ANALYSIS

The mine plan contains the following deficiencies:

1) Map 3-6D, "Incidental Boundary Change--Tract 2 Mining Sequence," *Figure 3-6D* must be certified by a qualified, registered, professional engineer or land surveyor (see R645-301-521.111 and -521.112).

2) Map 3-8, "Tract 2--Areas of Coal Recovery," must be certified by a *Figure 3-8* qualified, registered, professional engineer or land surveyor (see R645-301-521.111 and -521.112).

3) Map 6-5, "Cross Section A-A--Line of Section Shown on Figure 6-4, *Figure 6-5* Geologic Map," must be certified by a qualified, registered, professional engineer or land surveyor (see R645-301-512.150, -612, and -622.200).

4) Figure 1 of Appendix 7, "Water Well Location," must be certified by a *Figure 1* qualified, registered, professional engineer or land surveyor (see R645- *App. 7* 301-512.140, -712, and -722.400).

• ~~5)~~ Figure 5-1 of Appendix 7-14, "Structure Contour Map--Top of Hiawatha Seam," must be certified by a qualified, registered, professional engineer or land surveyor (see R645-301-512.150, -612, and -622.200).

~~X~~ ~~6)~~ Map 7-9A, "Underground Water Monitoring Locations," must be certified by a qualified, registered, professional engineer or land surveyor (see R645-301-512.140 and -731.730). *Figure 7-9A*

• ~~7)~~ Plate 1 of Appendix 12 must be certified by a qualified, registered, professional engineer or land surveyor (see R645-301-612 and -622.200).

~~X~~ ~~8)~~ The permittee must include in the mine plan a commitment to inspect the sediment pond quarterly (see R645-301-514.330) and to submit a certified inspection report yearly (see R645-301-514.310). *Sec. 7.2.4.2, p. 7-526*

~~X~~ 9) Tables 3-3 and 3-4, pages 3-62 through 3-69, contain a final reclamation cost estimate, but nowhere in the plan are there demolition volumes, earthwork volume estimates, or calculations of any kind to show how the figures in those tables were arrived at. Thus, it is impossible to review or confirm the accuracy of the reclamation cost estimate or the adequacy of the reclamation bond. The permittee must provide the necessary calculations and estimates for inclusion in the plan (see R645-301-542.800). *Sec. 3.5.7 p. 3-61a, p. 3-70; Figures 3-1, 3-12, 3-12A, 3-17 & 3-17A.*

~~X~~ 10) R645-103-234, as referenced by R645-301-521.133, requires that the mine plan demonstrate how the interests of the public and landowners will be protected if coal mining and reclamation operations are to be conducted within 100 feet of the right-of-way line of a public road. Since this operation is located within 100 feet of a public road, the permittee must demonstrate in the mine plan how he has complied with these regulations. *Sec. 3.2.10, p. 3-6a.*

~~X~~ 11) Throughout the plan, reference is made to "highwalls" which will be retained in final reclamation, but the actual highwall is to be completely reclaimed. What is obviously meant by the term "highwall" are the small rock faces on the cut banks of roads and pads, some portions of which will be retained as terraces to enhance *pp. 3-56b, 3-57, 3-58, 3-58a,*

Page 3
Midterm Review
ACT/015/009
August 21, 1992

the stability of the road backfills. The permittee must make the distinction between highwalls and cut banks throughout the plan, since all highwalls must be completely eliminated during final reclamation (see R645-301-553.120).

RECOMMENDATIONS

It is recommended that the permittee correct the deficiencies listed above.

jbe
TM9RV.MEM