



January 6, 1993

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DIVISION OF
OIL GAS & MINING

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

RE: **RESPONSE TO MID-TERM REVIEW, PACIFICORP, TRAIL MOUNTAIN MINE,
ACT/015/009, FOLDER #2, EMERY COUNTY, UTAH**

Dear Ms. Grubaugh-Littig:

The enclosed information is submitted in response to a telephone conversation with Jess Kelley of your staff, Karl Housekeeper, and me. Mr. Kelley raised several questions regarding the Mid-term Review Response submitted on October 28, 1992 by Dan Guy of Mountain Coal Company. This submittal references items in Mr. Kelley's mid-term review of August 21, 1992 (copy attached) and addresses his recent questions as follow.

- Memo Item 5) Figure 5.1 of Appendix 7-14 was certified by Mr. Dan Guy on 11/3/92 and submitted after the October 28 response; however, the submitted copies were not found at the Division, and three (3) additional copies are enclosed.
- Memo Item 7) Plate 1 of Appendix 12 is contained in a consultant engineer's report which was prepared in 1985. The report addresses pillar extraction in the eastern portion of the mine. Mining occurred in this area of the mine in 1987 and the area was sealed in 1989. It appears that pillar extraction was not completed by Mountain Coal Company as proposed. Additionally, the proposed pillar extraction does not appear to be compatible with future mine planning for the Trail Mountain Mine; therefore, certification of Plate 1 of Appendix 12 is not applicable. Chapter 12 and related appendices will be reviewed and the PAP will be amended as appropriate.



State of Utah
 DEPARTMENT OF NATURAL RESOURCES
 DIVISION OF OIL, GAS AND MINING

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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:

- X* 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).
- *X* 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).
- X* 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).
- X* 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.

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