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MAR 20 1989

Rick Smith
Geologist
Utah Division of Oil Gas & Mining
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

 DIVISION OF
OIL, GAS & MINING

20 March 1989

Dear Mr. Smith:

Ref: Response to Mid-Term Review (March 1, 1989), Co-Op Mining Company, Bear Canyon Mine, ACT/015/025, Folder #2, Emery County, Utah

Attached are two copies of Co-Op Mining Company's response to the referenced review. This material should close the items as listed. Listed below are the UMC number with the appropriate page or appendix number along with comments about the response.

UMC 783.13 Description of Hydrology and Geology: General Requirements

We are still waiting for a response from the Utah Division of Environmental Health on the NOI for a UPDES. Mr. Herkimer of the Division informed me on 1 March 1989 that he was recommending approval for a general permit to his supervisors.

UMC 783.13 Reclamation Plan: General Requirements

Chapter 3 Removal of the lamphouse, powder magazine, and
Pages 3-93 electrical service depot has been included in the
thru 3-99 bond estimate.

(b)(5)(ii) Rate of Artemisia ludoviciana seeding has been
Page 9-21 reduced to .15 lbs/acre.

Pages 3-48, Text has been corrected to reference Chapter 9
3-80 and 3-82

Table 3G-1 Corrections have been made.
Page 3G-4

UMC 817.22 Topsoil: Removal

Page 8-12 Surveying and identification of the down-cast
material as substitute plant growth material will
be completed as soon as possible. There are 6,000
cu yds (2,600 cu yds and 3,400 cu yds) of existing
storage in the original and Ball Park topsoil
storage piles. This leaves an excess of
approximately 1,000 yds above the amount required
for the 6.2 acres requiring topsoil.

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Section 1.2 Statement has been rewritten.
Page 1-8

Table 8.6-2 Text identifies down-cast material as substitute
Page 8-18 plant growth material.

UMC 817.22 Topsoil: Storage

I have discussed this with Mel Coonrod (Reclamation Specialist and previous consultant to Co-Op). All plant growth is to be viewed as beneficial in preventing erosion for interim reclamation. Establishment of "noxious plants" is apparently a problem when defined as such by Emery County and it is their prerogative to remove them as they deem necessary.

Section Plate 8-3 is presently located as page 8-13
3.3.11

UMC 817.22 Topsoil: Nutrients and Soil Amendments

Section 8.9 Sodium Absorption Ratio has been included on the
Page 8-24 list of analyzed constituents.

UMC 817.48 Hydrologic Balance: Acid-Forming and Toxic Forming

Testing was recently completed and submitted to the department on the material from Sediment Pond "A" and there was no indication of acid or toxic forming materials. If UDOGM still feels it necessary to have additional confirmation of previous results this additional information will be submitted by 4 August 1989.

UMC.71 Disposal of Excess Spoils and Underground Development Waste: General Requirements

Sediment material test results were received 11 March 1989. They indicate no toxic or acid-forming materials. Material will be placed on the coal storage area under the loading conveyors. This material will be submitted as soon as the maps have been corrected.

UMC 817.101 Backfilling and Grading: General Requirements

Section 3.6.4 Text has been corrected.
Page 3-73

Section 4.5 Text has been corrected to properly indicate
Page 4-15 reclamation procedures.

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UMC 817.116 Revegetation: Standards For Success
(a)

Arrangements will be made with the Division biologists to complete proper staking of Trail Canyon reference area before 1 May 1989. Figures and text will be corrected as needed following that visit to the site.

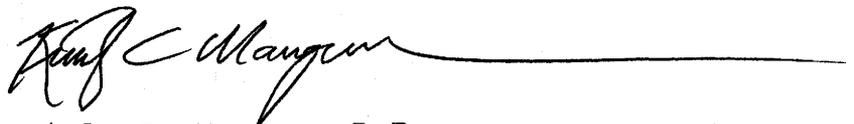
Page 9A-1 Statement has been deleted.

(b)(3) Text has been corrected to identify the levels as
V Page 3-87, indicated.
3-88

(b)(3)(iv)
Page 9A-7 Table 9A-3 applies to both pinyon-juniper and riparian habitats.

If there are any additional comments that require discussion or corrections please call me. Thank you for your cooperation in this matter.

Sincerely,



Kimly C. Mangum, P.E.
Permitting & Compliance Consultant.

cc: W. Owen