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17 May 1992

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

Dear Ms. Grubaugh-Littig:

Re: Technical Deficiencies Related to Division Order Item #8, Bear Canyon Mine,  
Co-Op Mining Company ACT/015/025, Emery County, Utah

This submittal is made at the request of Co-Op Mining Co to address the referenced issues. Attached are two copies of proposed pages for the mine plan. Modifications and updates have been made to the text to address issues made by Henry Sauer of the Division in a review dated 1 March 1992.

Each issue is addressed separately on the attached pages. Please notify me if there are any questions or concerns regarding any of the referenced issues.

Thank you,



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

Enclosure(s)

cc: Co-Op Mining Co.

## **TECHNICAL REVIEW**

### **R645-300-133.700**

This issue was addressed with DO-92C and NOV #N-91-35-8-1. Please contact Charles Reynolds at the mine site to arrange an on-site observation visit if the Division has any additional concerns.

### **R645-301-140 Maps and Plans**

Plates 3-2A and  
8-5A

Attached is partial copy of Plate 2-1 from 1985. I propose that the access road was erroneously added to the permit area at some time in the past and that the corrections made are proper. The ball park topsoil pile has always been an island and not connected to the main permit area. The access road is used for recreation and not mining purposes. The present and post-mining use for both the ballpark (topsoil storage pile) and adjacent area is for recreation. The access road will only be used in association with mining activities during reclamation. No reclamation or changes to this road have been proposed by Co-Op Mining Co. nor recommended by the Division.

### **R645-301-233 Topsoil Supplements and Substitutes**

pp 8-20 thru 8-  
41, 8A-4, 8D-3  
and App 8-E

Section 8.7 thru 8.11 have been rearranged to improve presentation of the information. Modifications have been made to resolve the open issues and incorporate soil test results. Testing indicates that in-place materials can suitably be used for reclamation.

Plates 8-5B & 8-  
5C (Rev 5)

The two proposed borrow areas are not required and have been removed from the plates. Use of these areas would have created a larger disturbance and increased the extent of reclamation activities.

Test Plots

Markers placed by Henry Sauer of the Division in August 1989 are still in-place. The Division has been invited previously to meet on-site if they wish, to relocate the test plot. Please contact Charles Reynolds at the mine and this can be arranged.

**R645-301-242 Soil Redistribution**

p 8-41                      See Section 8-11. Text has been modified to incorporate recommendations for testing frequency taken on a per acre basis. Additional soil samples will be taken in the event that the initial sample results indicate unsuitable material.

Plates 8-5,  
Section 8.9,  
p 8-28                      This issue has been resolved in past revisions. See note on Legend "Area not requiring recontouring or topsoil within disturbed area".

**R645-301-513.300 Underground Development Waste**

Plate 2-4C (Rev  
8), pp 3-32, 3-  
57, 3-58, 3-66,  
3E-2, 3E-3 (5/92)                      Co-Op Mining Co. Bear Canyon Mine does not have facilities to separate/develop "coal waste" material. Rock may be hand separated from lump coal so minor quantities may be developed. A proposed site has been shown on Plate 2-4C. Text has been modified to reference the proposed site and to note placement and testing.

**R645-301-623.100**

Plates 3-4A and  
3-4B (5-15-92), p  
3-58                      Existing and proposed sample site locations for the collection of roof, floor and mid-seam material have been added.

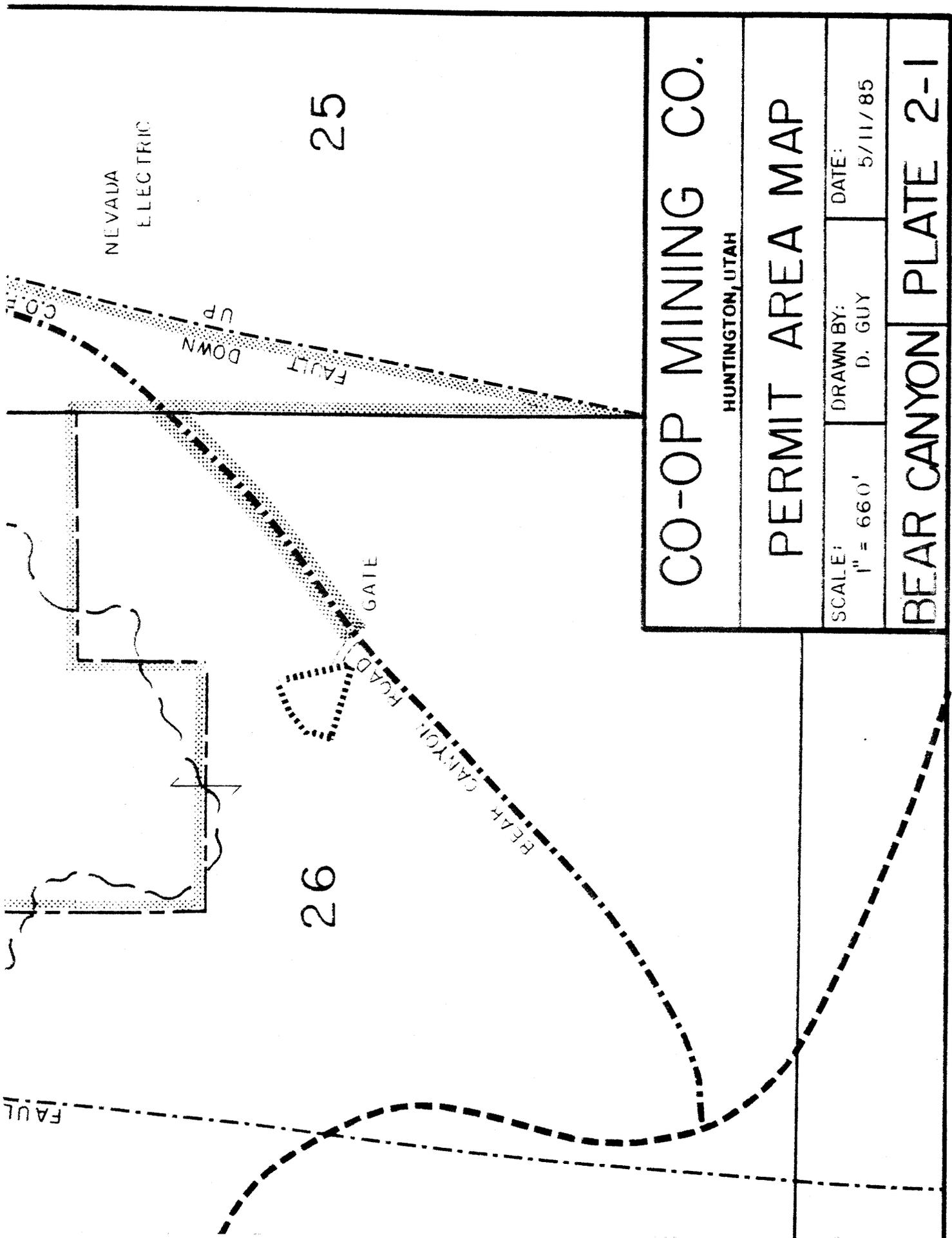
pp 2-10, 3-vi, 3-  
2, 3-11, 3-27, 4-  
8, 4-8A, 6-10, 6-  
17, (5/92)                      These pages were modified to show the new number for Plates 3-4A and 3-4B. These plates were formally noted as 3-4 and 3-4a.

**ADDITIONAL ISSUES**

The following pages were submitted in December 1991 in response to the review dated in August 1991 and no approval or comments have been received from the Division.

3-11, 3-12  
(10/91)                      Submitted in Dec 1991. Only minor editorial and repositioning changes were made.

3K-3 thru 3K-6  
(12/91)                      Sampling has been added to procedures. Table 6 from the Division "Guidelines for Management of Topsoil and Overburden" has been added as Table 3K-1. This Table was added as directed by Henry Sauer of the Division. Please notify me if there are any of the parameters that can be deleted for the sediment pond material or the materials discussed in Appendix 3-E which also references this table.



NEVADA  
ELECTRIC  
CO.

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# CO-OP MINING CO.

HUNTINGTON, UTAH

## PERMIT AREA MAP

SCALE: 1" = 660'      DRAWN BY: D. GUY      DATE: 5/11/85

BEAR CANYON PLATE 2-1