



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

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February 14, 1994

TO: Pamela Grubaugh-Littig, Permit Supervisor
FROM: Jess Kelley, Reclamation Engineer *JK*
RE: Review of Tank Seam Application Package, Co-Op Mining Company, Bear Canyon Mine, ACT/015/025-93B, Folder #2, Emery County, Utah

SYNOPSIS

The permittee first submitted the Tank Seam proposal for Division approval in 1993. The Division rejected the first proposal. The permittee then submitted the proposal in its present form on December 3, 1993. This memorandum is the result of my review of the December 3, 1993 proposal.

ANALYSIS

The plan for the Tank Seam contains the following deficiencies. These deficiencies again make the plan unapprovable.

1) Page 3H-2 says that "care will be taken to prevent disturbed material from migrating downslope." But the plan contains no description of how such "care" is to be exercised. The plan submitted in 1993 contained provisions for a wooden barrier below all fills to contain the fill and prevent its migrating downslope. Such a barrier, the necessity of and the design for which have been discussed by the Division and the permittee, must be included in the plan.

2) The cross-sections located on page 3H-4 and shown on pages 3H-6 through 3H-36 do not jibe with the cut-and-fill summary of Table 3H-1 (page 3H-5). In particular, cross-sections 12+00, 13+00, and 21+00 show fill, but Table 3H-1 shows no fill at the same stations; cross-sections 4+00, 5+00, 10+00, and 26+00 show no fill, but Table 3H-1 shows fill at the same stations; cross-sections 8+00 and 15+00 show no cut, where Table 3H-1 shows cut at the same stations.



3) The blasting plan in Appendix 3-M fails to discuss compliance with the requirements of R645-301-524.500, which have to do with blasting signs, warnings, and access control.

4) The last paragraph of page 8-37 says that "all disturbed slopes will be revegetated using the permanent seed mix outlined in Table 9.5-3 in anticipation of the road being used for post-mining purposes." How will the slopes be revegetated without topsoil redistribution? According to R645-301-414, the original plan must demonstrate how the land can be returned to its "premining land-use capability." This regulation simply insures that both the bond and the plan are adequate to return the land to its original premining condition in the event of bond forfeiture. However, the plan must still describe the operation as the permittee actually anticipates that it will be conducted.

5) Both the reclamation stability analysis in Appendix 3F and the operational stability analysis in Appendix 3H recommend that material in the constructed fills exclude rocks greater than cobble-size and that the fills be constructed by compacting the fill material in 8-inch lifts. Yet these recommendations have not been incorporated into the plan. In fact, page 3H-3 says that, in the construction of the operational fills, material will be compacted in 3-foot lifts. This is not acceptable. The plan must commit to reasonable material sizing and compaction parameters and explain adequately how those parameters are to be met.

6) Needless to say, the present reclamation cost estimate does not take into account the preceding deficiencies. The reclamation cost estimate will have to be revised to reflect the correction of these deficiencies, especially 1, 2, 4, and 5.

RECOMMENDATIONS

It is recommended that the Tank Seam proposal be rejected until the deficiencies listed above have been corrected.

cc. Daron Haddock