



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

Michael O. Leavitt  
Governor

Ted Stewart  
Executive Director

James W. Carter  
Division Director

355 West North Temple  
3 Triad Center, Suite 350  
Salt Lake City, Utah 84180-1203  
801-538-5340  
801-359-3940 (Fax)  
801-538-5319 (TDD)

February 14, 1994

TO: File

FROM: Susan M. White, Senior Reclamation Biologist *SMW*

RE: Tank Seam Road, Co-Op Mining Company, Bear Canyon Mine, ACT/015/025, Folder #2, Emery County, Utah

SYNOPSIS

Co-Op Mining Company is proposing to open a portal at the Tank Seam which will require construction of a road which is approximately 3000 feet in length. The average slope the road will traverse is 35 degrees.

ANALYSIS

In my initial review of the proposed Tank Seam Road and portal area (memo dated July 27, 1993), I expressed concern with the stability of the cut and fill slopes, reclaimed slopes and the subsequent revegetation of these areas. The operator responded with a Geotechnical Report which stated that given certain conditions, the stability would be similar to the undisturbed area. Stability of the reclaimed road and portal would require compaction of the fill material in eight-inch lifts and a five-inch particle size limit. This requirement for compaction is contrary to topsoil adhesion and will inhibit plant root penetration. Additionally, surface roughness for water holding and erosion control is unattainable because of the compaction requirement. The operator has addressed the mass stability of the slopes, but fails to discuss ripping commitments, topsoiling, surface roughness, and other conditions specific to the Tank Seam in relation to surface stability.

This application for permit change is at the technologic limit for successful revegetation as required by R645-301-350. In my professional opinion which includes 14 years of practical experience, I cannot make a finding in accordance with R645-300-133.710. The operator has not demonstrated that reclamation as required by the State Program can be accomplished according to information given in the application for permit change. In accordance with R645-300-131.200, the burden of establishing

