0001

015/025 # 2 + #5

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)

January 5, 1995

TO: Joe C. Helfrich, Permit Supervisor

FROM: Peter Hess, Engineer

RE: NOV Abatement for Bear Canyon ACT/015/025

I have reviewed the material which Mr. Charles Reynolds has submitted as Appendix 3-H, **SURFACE EFFECTS OF SUBSIDENCE,** for the Bear Canyon Mine which is the first draft of CO-OP's intended mitigation plan for the abatement of NOV N94-46-4-1B.

In reviewing the plan and the photographs which Tom Munson took on October 25, 1994, I have calculated that approximately 1,600 cubic yards of material will be necessary to fill the voids, which seems to me to be a huge amount of material to attempt to move by manual labor. Although Mr. Reynolds indicates that explosives will be used to "assist" in closing and sealing the openings and large fracture, he does not indicate how the charges will be placed or how any of the other criteria which must be designed will be so done as required by R645-300-524.210 & 212. Mr. Reynolds references Appendix 3-M as the blast design control; however, the blast design in Appendix 3-M specifically refers to boulder size reduction and blasting design for road construction purposes. Boulder size reduction may be utilized in the making of fill for the voids; however, this presents another problem. How does the permittee propose to place the charges to reduce the vertical sides of the holes and how will the reduced boulders be placed in the voids without endangering the lives of the workers?

It appears that Mr. Reynolds plans to obtain the fill material (1,600 yards) from wherever he can. I don't believe this is logical as if this is approved as is, he can destroy vegetation and natural sediment control at random. He will be working right in a drainage. Although the drainage was not flowing at the time I inspected the area, it's watershed consists of 56 acres, (See page 3N-4). Alternate sediment control is not addressed, (R645-301-742.111). Revegetation is not addressed, (R645-301-353). Compaction is not addressed, (R645-301-553.522).

I personally feel that there are just too many questions that can be asked that are not addressed in this so-called mitigation plan. The R645 rules certainly have not been addressed. Therefore, I believe that Mr. Reynolds should be told to try again.

I would appreciate hearing your comments concerning this.

Enclosures (1)