



State of Utah

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DIVISION OF OIL, GAS AND MINING

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November 4, 2002

TO: Internal File

FROM: Michael Suflita, Hydrologic Reclamation Specialist *MS*

RE: BTCA Area, Co-op Mining Co., Bear Canyon Mine, C/015/025-AM02F-1

SUMMARY:

On May 14, 2002 the Division received an amendment to remove artificial silt control measures and only use vegetation in three BTCA areas. On August 29, 2002 the Division returned a Technical Analysis to the Operator with one deficiency. On October 15, 2002 the Division received a revised amendment. This Technical Analysis is a review of that latest submittal. There is one deficiency.

TECHNICAL ANALYSIS:

OPERATION PLAN

HYDROLOGIC INFORMATION

Regulatory Reference: 30 CFR Sec. 773.17, 774.13, 784.14, 784.16, 784.29, 817.41, 817.42, 817.43, 817.45, 817.49, 817.56, 817.57; R645-300-140, -300-141, -300-142, -300-143, -300-144, -300-145, -300-146, -300-147, -300-147, -300-148, -301-512, -301-514, -301-521, -301-531, -301-532, -301-533, -301-536, -301-542, -301-720, -301-731, -301-732, -301-733, -301-742, -301-743, -301-750, -301-761, -301-764.

Analysis:

Sediment Control Measures

The amendment proposes to revise BTCA areas D, and F to use plant cover as the sediment control method and eliminate all artificial erosion control measures. Justification for this is contained in Attachment A, Vegetation Monitoring for Erosion Control, a report by Mt. Nebo Scientific, Inc. This report details the types of plant species in the BTCA areas and compares them to a reference area. Included are Trees & Shrubs, Forbs, and Grasses for each area. Also included are statistical analyses comparing the areas to the reference area. Basically, the percent cover in areas D, and F are greater than the reference area. Also, there is

TECHNICAL MEMO

considerable plant diversity in the areas. The report does a credible job of justification. In addition, a field visit on August 29, 2002 showed areas D and F can be revised as proposed in the amendment. Both areas have revegetated well and no rills or gullies are apparent.

The cover letter indicates, "We are no longer trying to remove the erosion controls for BTCA Area C." The amendment submittal contains copies of page 7K-3 only. The argument for withdrawal of Area C is contained on page 7K-4. Thus, page 7K-4 should be the one to be replaced in this revised amendment. This was discussed with the Operator and they concur. The Operator needs to submit a revised page 7K-4 and include clean copies of pages 7K-3, 7K-4, and 7K-5.

The page, 7O-45 explaining culvert C-36 was not used is acceptable and desirable.

Findings:

The amendment does not meet minimum regulatory requirements. Accordingly, the Permittee must address those deficiencies as found within this Technical Analysis and provide the following, prior to approval, in accordance with the requirements of:

R645-301-121.200, The Operator needs to submit a revised page 7K-4 and include clean copies of pages 7K-3, 7K-4, and 7K-5.

RECOMMENDATIONS:

The amendment should not be approved in its present form.