

0006-



# State of Utah

DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF OIL, GAS AND MINING

Norman H. Bangarter  
Governor

Dee C. Hansen  
Executive Director

Dianne R. Nielson, Ph.D.  
Division Director

355 West North Temple  
3 Triad Center, Suite 350  
Salt Lake City, Utah 84180-1203  
801-538-5340

February 3, 1989

Mr. Andy King  
Genwal Coal Company  
P.O. Box 1201  
Huntington, Utah 84528

Dear Mr. King:

Re: Permit Renewal, Genwal Coal Company, Crandall Canyon Mine,  
ACT/015/032, Folder #2, Emery County, Utah

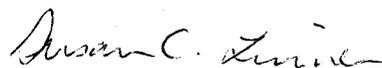
The Division has received information, submitted by Mr. Richard Hinckley, regarding the new ownership of Genwal Coal Company. This is sufficient to run the Office of Surface Mining's Applicant Violator System (AVS) program. However, rules UMC 782.13(b)(3) and (d), regarding past mining operations and permits, were not addressed in the letter, and must be. It is suggested that Chapter 2 of the Mining and Reclamation Plan be resubmitted with all appropriate changes made.

Genwal has also not addressed the Division's requirements under UMC 817.101 in the October 26, 1988 Determination of Completeness Review (a copy is enclosed for your information). An accurate mass balance of reclamation materials must be submitted so that the Division can calculate the required amount of reclamation surety. We must ensure that adequate surety is posted before a new five-year permit can be issued. Please provide this information by March 3, 1989. Failure to provide this information, and therefore pursue a repermit in a timely manner, could result in enforcement action, due to the fact that the original permit period has expired.

Page 2  
Genwal Coal Company  
Mr. Andy King  
ACT/015/032

Please contact me or Randy Harden, Reclamation Engineer, if you need clarification.

Sincerely,



Susan C. Linner  
Reclamation Biologist/  
Permit Supervisor

scl

Enclosure  
cc:R. Hinckley, Nevada Electric  
J. Leatherwood  
R. Harden  
BT45/161-162

The operator has indicated in this section that underground development waste will be returned to underground workings, however, no determination as to the handling of mine development waste in conjunction with the development and construction of the surface facilities has been accomplished in the MRP.

UMC 817.101 Backfilling and Grading: General Requirements - JRH

This section is not considered to be adequate.

The operator has referenced this section of the regulations to Part 3.5.4 of the MRP and plates 3-1 and 3-5.

The operator has included in the MRP, cut and fill calculations for portions of the site to be reclaimed. These calculations are found in Item 3-12. However these calculations indicate a shortage of material of approximately 10,000 cubic yards of fill required for the site.

No reference as to the mass balance of the materials required for backfilling and grading is made in the MRP. The operator must provide earthwork calculations and a mass balance for the backfilling and grading to be accomplished on the site. The operator shall include suitable cross sections indicating the pre-mining, the mining, and the post-reclamation sections of the site in order to show the cut and fill requirements and in order to determine whether or not the operator has met approximate original contour requirements for the site.

Earthwork calculations shall also include a mass balance for topsoil requirements on the site. These, and the general earthwork calculations, can be provided as part of the bonding calculations, which will further require equipment selection and productivity calculations for the backfilling and grading in order to determine the adequacy of the reclamation bond.

In those areas where complete reduction of highwalls along cuts, pads, portals and embankments is not to be accomplished, the operator shall be required to provide justification for the remaining highwall. This justification shall include, but not be limited to, stability analysis of the highwall and the fill material to be backfilled.