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**GENWAL**  
RESOURCES, INC.

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January 28, 2000

Utah Coal Program  
Utah Division of Oil, Gas and Mining  
1594 West North Temple, Suite 1210  
P.O. Box 145801  
Salt Lake City, UT 84118-5801

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FEB 02 2000

DIVISION OF  
OIL, GAS AND MINING

Re: Highwall Elimination Deficiency, GENWAL Resources, Inc., Crandall Canyon Mine,  
ACT/015/032. *Planning*

*Copy Pam*

Dear Sirs:

Mr. Daron Haddock contacted me earlier in the month concerning the last deficiencies in the Highwall Elimination Plans in the PAP. This was addressed in the permit change application of August 1999 and was incorporated into the PAP effective September 2, 1999. The three deficiencies, listed in the technical review by Wayne Western on 2/3/99 were addressed. The changes required are on page 49 in Chapter 5, a copy of which is attached.

If you have questions, please call.

Sincerely,

Gary E. Gray  
Engineer

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DIVISION OF  
OIL, GAS AND MINING

### 5.53 Backfilling and Grading

Backfilling and regrading of disturbed lands has been designed to restore all disturbed areas affected by surface operations to the approximate original contour of the land. This is made possible by the fill material required by the 1997 facility expansion project. Reclamation of affected areas, including revegetation is outlined in Chapter 3, Section 3.41.

During reclamation, the subsoils or backfill material will be laid down in 12" to 18" lifts and compacted through repeated travel by heavy equipment. This method has been utilized by a number of mines in the area and appears to give excellent compaction prior to topsoiling. In areas with slopes of less than 30%, the subsoil will be ripped to a depth of 18" prior to topsoil placement. In areas having average slopes of more than 30% the subsoil will be ripped to a depth of 12", where practical. Topsoil will then be redistributed in a manner that achieves an approximate, uniform stable thickness and other specifications stated in Chapter 2, Section 2.42 of this document.

#### Removal or Reduction of Cut Slopes and Highwalls

Prior to backfilling and grading of the highwall area above the portals and the cutslopes above the old coal loadout area, existing shotcrete, wire mesh, clips, and other related material will be removed and disposed of in an appropriate manner. All noncombustible material generated from the removal of shotcrete will be disposed of underground (within the mine) prior to the sealing of the portals. All other waste generated will be removed and disposed of in an appropriate State permitted land fill.

Backfilling and grading will proceed so as to eliminate the cut slope and highwall. Refer to Plate 5-3 for the highwall location. The cut slope above the coal stockpile area will be backfilled to match the approximate original contour with fill material from the Expansion Area pad. The Forest Service Trailhead Access Road will be left in place, but the surface will be modified to meet design specifications, as directed, by the Forest Service (see Appendix 1-2). See Plate 5-17 for the Forest Service road location.

The stability of the reclaimed highwall and cutslopes has a safety factor greater than 1.3 and is shown in Appendix 5-21.

No highwalls or remnants will remain after reclamation.

#### Terracing and Erosion Control

No terracing will be done. All final grading and surface preparation of overburden completed prior to the redistribution of the topsoil will be done along the contour to minimize erosion in areas with slopes less than 30%. In areas with slopes greater than 30% the grading, preparation and placement in a direction other than generally parallel to the contour will be used.

