



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

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September 21, 1995

TO: Daron Haddock, Permit Supervisor

FROM: Wayne H. Western, Reclamation Engineer *W H W*

RE: Mid-Term Review Response on AOC Issues, Convulsion Canyon Mine, SUFCO, ACT/041/002, Folder #2, Sevier County, Utah

Permittee's Proposal:

Eliminate all request for a variance to the approximate original contour requirements. Requested a variance to AOC requirements under Section 5.4.2.2 Plan for Backfilling, Soil Stabilization, Compacting and Grading and Section 5.5.3.6 Approximate Original Contour.

Analysis:

The permittee and the Division acknowledge that it is impossible to reclaim the pad area to the pre-mining configuration. The pre-mining slopes had an angle of 1 vertical to 1.5 horizontal (1V:1.5H). The safety factor for slopes made of consolidated material with that angle is approximately 1. Both state and federal regulations require that the safety factor for all reclaimed slopes be 1.3 or greater.

Based on past reclamation efforts, the Division acknowledges that successful revegetation is highly unlikely on slopes steeper than 2 horizontal to 1 vertical (2H:1V). On slopes steeper than 2.5 horizontal to 1 vertical (2.5H:1V) special techniques are often needed to keep topsoil in place and establish vegetation.

Cutslopes at the pad are greater than 1 horizontal to 1 vertical (1H:1V) and consist of exposed bedrock. Because the slopes are made of bedrock, they can have very steep slopes and still meet the minimum static safety factor. Some cutslopes will remain and others will be partially reclaimed.

The permittee used "highwalls" to describe the cutslopes. Highwalls for underground coal mines are defined as the entry to underground coal mining activities. The permittee has changed the wording of the MRP to clarify that portal faceup areas will be backfilled and regraded, thus reclaiming the highwalls.

The backfilling and regrading plan will meet the AOC requirements. The permittee has eliminated all references and requests for variances from the AOC requirements.

One reason for the granting a variance from the AOC requirements is the lack of fill material. The Division and the permittee agree that little, if any material that was disturbed during the pre-SMCRA phase of the construction of the surface facilities was taken off-site. No material associated with the construction of the post-SMCRA surface facilities has been taken offsite.

Recommendations:

Approve the modifications for the Mid-term Review Response that were received on September 14, 1995.