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Cindy S. Emmons
Director, Environmental Affairs

Kennecott

September 3, 1991

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DIVISION OF
OIL GAS & MINING

Mr. Holland Shepherd
Senior Reclamation Specialist
Department of Natural Resources
Division of Oil, Gas and Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, UT 84180-1203

Subject: Fourth Line Mill Expansion Permit Submittal, Technical Review Response, Kennecott Utah Copper, M/035/002, Salt Lake County, Utah

Dear Mr. Shepherd:

As requested by Mr. Holland Shepherd in correspondence dated August 6, 1991, Kennecott has reviewed comments on the 4th Line Mill Expansion Amendment. Responses are provided below for each comment in order as presented by DOGM.

1. *Page iv, List of Figures. Drawing 271-SKC-120 Rev. F "Disturbed Area Maps" is shown partially in boldface print indicating that it was revised, but this drawing is not included in the submission. The previous submission contains drawing 271-SKC-120 Rev. B.*

1. Drawing 2271-SKC-120 Rev. F was inadvertently omitted from the revised submittal, 2 copies, with map pockets, are included for addition to the revised amendment.

2. *Page 6, Proposed Surface Disturbance. Drawing 271-SKC-116 Rev. C is referenced and shown in boldface print but is not contained in this submission. The clay and select fill borrow area are referenced in the text, but it is unclear where these areas actually are. The only borrow area on the drawings submitted is labelled as Existing Borrow Area on drawing (2) 271-SKC-116 Rev. H. This same drawing contains an Existing Select Fill Stockpile, but not a select fill borrow area. Please clarify where these areas are.*

2. Page 6, Section C. Proposed Surface Disturbance, second sentence, Dwg. No. 271-SKC-120 Rev. C is a misprint. The correct drawing designation is 271-SKC-115 Rev. C. A corrected page 6 is included to replace current page 6 in your copy of the permit document.

The clay and select fill borrow areas are clearly identified on Dwg. No. 2271-SKC-120 Rev. F. As mentioned in the previous response, this drawing was inadvertently omitted from the permit document.

3. Page 6, Proposed Surface Disturbance. Reference is made in the text to general fill stockpile No. 1. Drawing (2) 271-SKC-116 Rev. H shows an Existing Common Fill Stockpile and a portion of General Fill Pile No. 2, but no General Fill Stockpile No. 1. Where and what is General Fill Stockpile No. 1?

It is assumed that General Fill Pile No. 2 (drawing label) and General Fill Stockpile No. 2 (text label) are one and the same. Please verify this. Only a portion of General Fill Pile No. 2 is shown on the H revision of the 116 drawing with reference to see the inset on drawing 2271-SKC-120. This submission contained no version of the 120 drawing. The previously submitted 120 drawing (Rev. B) is not consistent with this 116 drawing. This discrepancy needs to be corrected. Is there a new 120 drawing that was supposed to be in this amended plan?

3. General fill Stockpile No. 1 is shown on Dwg. No. 2271-SKC-120 Rev. F (see responses 1 and 2). General Fill Pile No. 2 from Dwg. No. 271-SKC-116 Rev. H is described in the text as general fill stockpile No. 2. Dwg. No. 2271-SKC-120 Rev. F shows this stockpile. The text (page 7) has been revised to the description as shown on Dwg. No. 2271-SKC-120 Rev. F.

4. Page 11, Final (Post-Mining) Reclamation Plan. Topsoil Stockpiles Nos. 1 and 2 are referenced in the text. Where or what is Topsoil Stockpile No. 1? Is Topsoil Stockpile No. 1 what was labelled as "Future Topsoil Stockpile" in the previously submitted drawing 271-SKC-120 Rev. B? Only New Topsoil Stockpiles Nos. 2 and 3 are shown on (2) 271-SKC-116 Rev. H.

4. New topsoil Stockpile No., 1 is shown on Dwg. No. 2271-SKC-120 Rev. F, which as stated earlier was inadvertently omitted from the permit submission.

5. Page 27, Table 6, Earthwork Detail. This table shows the addition of 41,000 cy of material with an Item Description of "topsoil in Select Fill Borrow area, Drum Storage Area, the Clay and General Fill Stockpile No. 2." This figure was not included in this table in the previous submission. What is this material and where did it come from? Does the 126,000 cy subtotal earthwork figure in Table 6 include the amendment's new topsoil figure of 85,780 cy? This

table does not list Topsoil Stockpile No. 3 with 7,780 cy. Why? Is Stockpile No. 3 included in something else?

5. Select Fill Borrow Area, clay and general fill pile No. 2 are shown on dwg. No. 2271-SKC-120 Rev. F. New disturbance associated with the drum storage area is detailed on Dwg. No. 271-SKC-116 Rev. H.

Page 27, Table 6, Earthwork Detail, Table 6, has been corrected and revised. The quantities given are volumes of topsoil slated for replacement in the areas described with an additional minor amount of non-topsoil material expected to be necessary for finish grading in preparation for topsoil replacement.

Page 21, Figure 2, has also been revised to reflect subtotals for post-construction and Final Reclamation as well as total volume stockpiled.

The total volume of topsoil in stockpile following completion of construction is projected to be 113,780 cubic yards. This figure does not reflect any adjustments for shrinkage or swell in the stockpile. Salvageable topsoil estimates are based on a conservative average removal depth of 6 inches.

6. *Page 38, Table 17, Post Mining Reclamation. This table lists a total of 114 acres as being prepared and planted. The amended text lists the total project disturbance as 136 acres not including temporary construction disturbance). The difference between these two figures is 22 acres. Pages 11-12 of the test lists the features which will remain after reclamation of the pipeline and (ore) conveyor service roads, the ore slurry pipeline, the return water pipeline, and the plant access road. It is assumed that the items which will remain constitute the 22 acres. Please verify this assumption. What is the itemized breakdown of these 22 acres which will not receive any revegetation treatments?*

6. The 22 acre figure is correct. These facilities will have an extended life beyond mine closure as described in the permit document. The ore slurry and return water pipelines with attendant service road account for approximately 10.6 acres. The ore conveyor corridor including service road is approximately 3.9 acres and the plant access road will account for approximately 7.5 acres. The total acreage slated for extended use beyond mill closure is expected to be approximately 22 acres. A discussion detailing the acreage remaining has been added to page 12 of the text for clarity.

The revision package includes revised pages iv, 3, 6, 7, 11, 12 and 13. Additionally, revised Figure 2, pg 21; Table 4, pg. 25; Table

5, pg. 26; Table 6, pg 27; and Table 17, pg 38 are provided in duplicate copies for inclusion in your copy of the permit document.

All concerns identified in your August 6, 1991 correspondence have been addressed. Should you have additional comments or questions, please contact me at (801) 569-6555.

Sincerely,

Cindy S Emmons

Cindy S. Emmons
Director, Environmental Affairs

CSE:bt

Enclosure