Wayne

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

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November 2, 1995

Elaine J. Dorward-King
Director, Environmental Affairs
Kennecott Utah Copper Corporation
8315 West 3595 South
P.O. Box 6001
Magna, Utah 84044-6001

Re: Secondary Tailings Pipeline Project, Kennecott Utah Copper Corporation, Copperton Modernization Project, M/035/011, Salt Lake County, Utah

Dear Ms. Dorward-King:

Thank you for your recent letter received October 11, 1995, which describes Kennecott Utah Copper (KUC) plans to add a second tailings pipeline within the same footprint of the existing tailings pipeline. Your letter indicates that the affected area for the new pipeline falls within the boundary of the originally approved and bonded pipeline utility corridor. Accordingly, it is KUC's understanding that this would not constitute a mine plan amendment/revision. You state that the second pipeline will continue to be used as a part of KUC's post mining water management program; therefore, it will not require that the existing reclamation bond be revised.

The Division has reviewed the original permit application and the approved reclamation commitments for the existing tailings pipeline. As the permit stands, the existing tailings pipeline, return water and copper concentrate lines, were approved to remain as post mining facilities; therefore, removal and demolition costs were not included in the original reclamation cost estimate.

Your letter fails to explain in sufficient detail, why this second tailings pipeline is required for Kennecott's post mining water management program. What are the specific plans for this pipeline following mine closure? Why are the three existing pipelines no longer sufficient to handle Kennecott's post mining water management objectives?

The Division is not prepared to accept Kennecott's proposal as presently described. We request further detailed information to support and substantiate the need for this additional

pipeline to remain upon mine closure. We also are not in agreement that this construction activity does not constitute a minor modification/amendment to permit M/035/011. In addition to the information requested above, we will require an appropriately revised surface facilities map showing the new tailings pipeline. The approved mine plan text should also be revised to reflect the addition of this new pipeline. The reclamation plan text should also be modified to describe the post closure plans for the second tailings pipeline, once we have mutually agreed upon its final disposition.

If you have any questions or concerns in this regard, please contact me or Tony Gallegos of the Minerals staff at (801) 538-5340.

Sincerely,

D. Wayne Hedberg

D. Wayne Hedberg
Permit Supervisor
Minerals Reclamation Program

jb
cc: Jon Cherry, KUC
Lowell Braxton, DOGM
John Whitehead, DWQ
Minerals staff (route)

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