STATE OF UTAH
NATURAL RESOURCES & ENERGY
Oil, Gas & Mining

Scott M. Matheson, Governor
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4241 State Office Building • Salt Lake City, UT 84114 • 801-533-5771

December 8, 1982

Mr. James W. Godlove
Director of Environmental Affairs
WhiteRiver Shale Oil Corporation
Suite 500, Prudential Building
115 South Main Street
Salt Lake City, Utah 84111

RE: Areas of Concern
White River Shale Oil Corporation
White River Shale Project
ACT/047/017
Uintah County, Utah

Dear Mr. Godlove:

The following list of Division concerns is provided to inform you of violations or potential violations of your permit and the Utah Mined Land Reclamation Act of 1975. This list was generated as a result of a November 11, 1982 field inspection and a November 16, 1982 OSO memo.

1. The road currently is used to channel runoff to the depression in the future runoff retention pond site. Grading activities had blocked several channels which convey runoff from the mine area to the road.

Remedy: Remove all obstructions to free drainage and ensure that in the future these areas not be blocked.

2. The third stockpile mentioned above is not an approved long term stockpile (see August 20, 1982 "Topsoil Management Plan").

Remedy: Submit a request for a modification which describes the area to be used for the stockpile site, its extent of the acreage involved and the anticipated volume of soil to be stored. The "Topsoil Management Plan" will of course, be applicable to this.

3. The general area between the concrete batch plant and the decline vent raise is used for a temporary site of administrative trailers as previously mentioned. This area was being used without the benefit of topsoil removal, structures were in place, vehicles (including heavy equipment) were being parked and/or driven over the native soil. This is a violation of the Utah Mined Land Reclamation Act of 1975 Title 40-8.

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Remedy: Refrain from any activity at this site until the topsoil has been removed and stored as per the "Topsoil Management Plan." Inform the Division when this has been acheived. Future activity of this nature is to be avoided.

4. An unauthorized disturbance has occurred along the "White River Flood Plain". This and a well at this site which according to a November 16, 1982, OSO memo was not drilled as per the approved plan are apparent permit violations.

Remedy: Provide a map and narritive describing the extent of the unauthorzed disturbance. Please provide an explanation of how this occurred and why the well was drilled in a manner not in accord with the approved plan. Address the reclamation of this area in the above-referenced map and narritive. What measures will be taken in the future to prevent a similar occurrence?

The Division looks forward to your response to all items identified in this letter. We are concerned that a pattern of events of this nature not be allowed to develop.

If we may be of any assistance, please call on us.

Sincerely,

Thomas L. Portle

THOMAS L. PORTLE
RECLAMATION SOILS SPECIALIST

TLP/mn

cc: Don Johnson, OSO
Sue Linner, DOGM
Jim Smith, DOGM
Tom Tetting, DOGM