

File ACT/007/002*2

BLACKHAWK COAL COMPANY

P.O. Box 700
Lancaster, Ohio 43130

January 23, 1990

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DIVISION OF
OIL, GAS & MINING

Ms. Susan Linner
Permit Supervisor
Utah Division of Oil,
Gas and Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180

Re: Response your letter of January 9, 1990
Technical Deficiency Review
Reclamation Plan - Willow Creek Site
ACT/007/002 Folder No. 2
Carbon County, Utah

Dear Ms. Linner:

I wanted to take this opportunity to make an interim reply to your technical deficiency review of the Willow Creek reclamation plan. Blackhawk is working to resolve the deficiencies identified by the Utah Division of Oil, Gas and Mining (UDOGM) and will be submitting direct responses as soon as possible. Our target for submittal is late this week or early next week. The purpose of this letter is to document Blackhawk's understanding of our telephone conversation of January 16, 1990. During that conversation we discussed the UDOGM comments on the Willow Creek reclamation plan and the responses necessary to address the remaining technical adequacy questions. Blackhawk understands that the following items need to be included in the reclamation plan.

UMC 817.42 Hydrologic Balance: Water Quality Standards and Effluent Limitations - MMD.

Blackhawk will incorporate monitoring of sediment trap 017 to the monitoring plan provided in the reclamation plan. A single stage sampler will be installed in this structure.

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UMC 817.43 Hydrologic Balance: Diversions and Conveyance of Overland Flow, Shallow Groundwater Flow, and Ephemeral Streams - MMD.

Blackhawk will submit a narrative of the survey methodology and raw data gathered to determine the D50 value of existing material in the Jap Canyon channel.

UMC 817.46 Hydrologic Balance: Sedimentation Ponds - MMD.

Blackhawk will provide certified as-built drawings of sediment trap 018 following reconstruction.

UMC 817.52 Hydrologic Balance: Surface and Groundwater Monitor - MMD

The monitoring program outlined on page 3-8 and Map 5 will be revised to include the outlet of Sediment Trap 017.

UMC 817.162 Roads: Class 2: Design and Construction - MMD

Blackhawk will prepare cross sections of the creek channel embankment at Culvert A and upstream of Culvert A. We will provide stability analysis utilizing average soil strengths for materials of the type found in the streambank.

As the division is aware, Blackhawk has no personnel in the Price area to perform field measurements. We are currently in the process of hiring a contractor to survey the cross sections accurately. We anticipate that the surveyor will be on site this week and that we will have cross sections available soon. This is one of the longer lead time items in responding to Division comments.

UMC 784.15 Postmining Land Use - LK

Blackhawk is currently in the process in revising our lease with Mr. Melvin Coonrod of Environmental Industrial Supply to include use of the on site substation for providing power to the small storage building located on the Willow Creek site. We are also requesting clarification of the uses approved for the Willow Creek site from the Carbon County Planning and Zoning Commission. As soon as these clarifications and lease modifications are obtained they will be submitted to UDOGM.

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Summary

The items and responses discussed above constitute Blackhawk's understanding of the only remaining items needed for technical adequacy of the Willow Creek site reclamation plan. We are proceeding with providing these responses to UDOGM as quickly as possible. Please review this information carefully as it is Blackhawk's intent to resolve these remaining issues with the next submittal. If there is additional information required, please let me know immediately.

Sincerely,

Conrad Parrish for Jody Belviso

Jody Belviso

cc: William Bosworth
Chandler Nowicki
Conrad Parrish