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STATE OF UTAH  
NATURAL RESOURCES  
Oil, Gas & Mining

File

Scott M. Matheson, Governor  
Temple A. Reynolds, Executive Director  
Dianne R. Nielson, Ph.D., Division Director

4241 State Office Building • Salt Lake City, UT 84114 • 801-533-5771

FEDERAL EXPRESS  
AIRBILL NUMBER 139-297-911

April 5, 1984

Mr. Robert H. Hagen, Director  
Albuquerque Field Office  
Office of Surface Mining  
219 Central Avenue, NW  
Albuquerque, New Mexico 87102RE: 10-Day Notice #X84-2-81-3  
Price River Coal Company  
Price River Complex  
ACT/007/004, Folder No. 7  
Carbon County, Utah

Dear Mr. Hagen:

In response to the 10-Day Notice #X84-2-81-3, received March 26, 1984, Dave Darby, Reclamation Hydrologist, and Sandy Pruitt, Field Specialist, conducted an inspection of the Price River Coal Company (PRCC) Price River Complex on March 30, 1984 and provide the following response.

In regard to TDN #1, requiring emergency spillways for the sediment ponds at Sowbelly Canyon and Hardscrabble Canyon, please refer to the letter dated April 20, 1982 (enclosed) which grants a variance to this requirement for the sediment ponds 003, 004 and 005 in Sowbelly Canyon. It was found that these ponds are oversized and would contain the runoff generated during a 25-year, 10-hour precipitation event without discharging. Therefore, PRCC is not in violation for not providing emergency spillways in accordance with UMC 817.46(1). Mr. Darby has evaluated the situation further and although supporting the previous conclusion, will require PRCC to provide an emergency spillway in pond 005 to protect the integrity of the structure in the event that design storms should come back to back. Pond 006 in Hardscrabble Canyon is scheduled for reclamation this summer and is, in fact, oversized by more than 300 percent for the 25-year, 24-hour precipitation event. In considering this, DOGM has decided to grant a variance to the emergency spillway requirement. Pond 007 is undersized by 30 percent for a 10-year, 24-hour precipitation event and DOGM will require that emergency spillways be emplaced, and that the pond be properly sized to control the expected runoff. Pond 008 is oversized for the 25-year, 24-hour event, but DOGM will require that an emergency spillway be constructed to handle, at least, a 25-year, 24-hour event. Please refer to NOV N84-2-6-2 enclosed. NOV #1 of 2 was issued for pond 007 which undersized. NOV #2 of 2 requires emergency spillways in ponds 007 and 008.

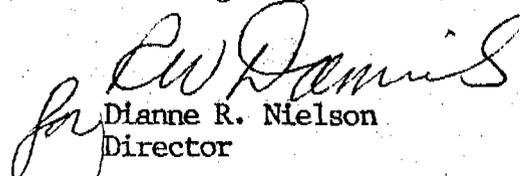
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In regard to TDN #2, the violation is improperly cited. The Barn Canyon diversion is a permanent ephemeral diversion with a drainage area greater than one square mile. Therefore, UMC 817.44(b)(1) is a more appropriate section. Some facts should be pointed out about this area which may negate the need to cite the area for a violation. The fill which forms a storage pad extends into the ephemeral stream. This pad was constructed long before PRCC took possession of the mine. During the several years that the fill has been in place, runoff has flowed down the drainage, formed a small pond along the edge of the fill, then seeps in and is later discharged about 20 yards away on the adjacent edge of the fill. In the several years this fill has been in place, no runoff has overtopped or washed away the fill, including last year's excessive runoff. Mr. Dave Darby has found that high volume runoff (100 year event) from both drainages would flow down the natural channel and pool in the low area adjacent to the fill. The runoff would flow around the fill in a channel sufficient to accommodate the flow without overtopping the fill. After the high flows, the ponded area would seep under the edge of the fill as it has for several years. The water seeping under the edge of the pad will not cause any erosion or excessive loading since this area has been stabilized over the years. It is, therefore, his opinion that erosion of the fill would not take place during low and medium (10-year, 24-hour) event since velocities are reduced by the ponding and from large boulders in the stream channel that are there more from rock falls from the precipitous slopes more than those that have been carried down by runoff. To ensure protection against high volume runoff, this Division will require that riprap be placed along the edge of the fill. Refer to the enclosed letter dated April 5, 1984.

Finally, in regard to TDN #3, a Notice of Violation is not warranted under UMC 817.42(a)(1) or UMC 817.44 as PRCC has provided and maintained a series of straw bale barriers and catch basins serving as a sediment treatment facility for runoff from the #3 Mine yard. The Division of Oil, Gas and Mining has determined that the straw bale series does not provide adequate sediment control and will require that PRCC replace the straw bales with an adequate sediment pond. Please refer to the enclosed letter dated April 5, 1984.

If you have any questions regarding this response, please do not hesitate to contact either Dave Darby or Sandy Pruitt.

Best Regards,

  
Dianne R. Nielson  
Director

DRN/SP:btb

Enclosures

cc: Rob Wiley, PRCC  
D. Darby, DOGM  
S. Pruitt, DOGM  
J. Helfrich, DOGM

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