

0003

PRICE RIVER COAL COMPANY

P.O. BOX 629 HELPER, UTAH 84526 (801) 472-3411



RECEIVED

DEC 19 1985

**DIVISION OF OIL
GAS & MINING**

December 16, 1985

Dr. Dianne R. Nielson, Director
DIVISION OF OIL, GAS AND MINING
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, UT 84180-1203

*ACT/007/004
#2*

Dear Dr. Nielson:

Further to our recent discussion concerning our mining permit and the various stipulations, perhaps it would be in order to review the entire process:

1. Some four years ago, we attempted to put together a Mining Reclamation Plan for DOGM. We had almost finished this, when it was taken over by OSM, and we were back to square one.
2. After about a year of battling and arguing with OSM, they had an internal shakeup, with attendant personnel changes, and we were back to square one again!
3. Four years after starting, we were assured by OSM that all was in order, and that a letter would be forthcoming to that effect. After several months had elapsed and no letter was received, I contacted OSM - they thought that a letter had been sent to us, but upon checking, found it had been sent to your office (by higher authority!). OSM did not have the courtesy to send us the letter, in which they had asked that we change portions of our answer to stipulation number one, and signed off on the remaining ten stipulations, as we had answered them. Your office kindly furnished me with a copy of their letter.
4. Either on the same day, or the next, that I received a copy of the OSM letter, I received a letter from DOGM adding and changing parameters either obtained from them, or approved by them! As we have often said, we can tell when a new person has been hired, or a change in personnel has been made - we have additional hoops to jump through for each such occurrence!

With the above facts in mind, we respectfully request that after four years, we cease to be used as a "Ping-Pong ball" between OSM and DOGM. We offer the attached answers to all eleven stipulations, and ask that you accept them (as has OSM).

Stipulation No. 1 we can live with, as presented, although it costs us about \$500 additional for each area that we cover and reclaim on the refuse pile.



Dr. Dianne R. Nielson, Director
Division of Oil, Gas and Mining
December 16, 1985
Page 2

The remark concerning Stipulation No. 5, we believe, is unwarranted. The situation has not changed in the four years of arguing and nit-picking and no violations have occurred. Are not all of these things "monitored" at each inspection? Nothing in the permit precludes continued monitoring.

Stipulation No. 6 is a shining example of my statement that we can tell when a new person has been hired, or a change made in personnel handling our permit. The parameters for underground monitoring were arrived at after lengthy consultation with your hydrologists, our consultants, and at least two trips underground by your hydrologists. The plan was put into effect, and has been monitored as such for about two years. We feel that the plan is sound, adequate, and something we can live with in the real world. In addition, the testing for manganese as requested, is specifically exempted in alkaline waters such as ours. Everyone concerned had heretofore argued that no useable information would be gained by adding such requests - after viewing the composite map of old workings in our area, I believe almost anyone would agree with us.

We would ask for your favorable consideration of this submittal as soon as possible, as several months have already elapsed due to the mix-up in communications - this, coupled with our lack of personnel to make all the necessary changes and submit them, will take us considerably longer than anticipated. We would, however, like to be in the position of handing to AMAX (or any other interested party) an up-to-date Mining Reclamation Plan with attendant stipulations agreed to by all concerned. We firmly believe that the above can be accomplished without further changes or additions.

Very truly yours,

PRICE RIVER COAL COMPANY



Kenneth B. Hutchinson
Chief Engineer

KBH:jp

Enclosure

cc: G. M. Lasley

Condition No. 1

The applicant must provide a plan to sample refuse materials prior to placement of soil material to determine the absence of acid-or toxic-forming materials. The plan must include proposed analyses and a physical sampling plan and must be submitted to OSM and UDOGM within ninety (90) days of permit approval.

Such sampling would be relatively simple. The refuse material is reasonably homogeneous by the time it is finally placed. Four to five grab samples will be collected per acre. The samples will be sent to a soil laboratory and tested for the following parameters:

pH	B
EC	Pb
Ca	N
Mg	P
Na	K
SAR	S- organic, pyritic, sulfate
Se	Particle size distribution: USDA (3" to 200 mesh)

Condition No. 2

The applicant shall either complete reclamation of Goose Island by August 31, 1985, and Hardscrabble Canyon and Sowbelly Gulch by December 31, 1986; or complete installation of culverts specified below according to design approved by OSM August 31, 1985 at Goose Island and by December 31, 1986 in Hardscrabble Canyon and Sowbelly Gulch. Designs for the new culverts (structures) shall be submitted to the regulatory authority for approval within ninety (90) days of permit approval. The specific structures included are: culverts 1 (including diversions D-1, D-4, and D-6) and culverts 3 and 10 in Sowbelly Gulch.

The reclamation of the Goose Island area was completed in November 1984 eliminating the need to upgrade Diversions D-1 and D-4 and Culvert C-1. Changes to the drainage pattern attendant to reclamation activities have reduced the basin size flowing to these structures as follows:

Structure Number	Peak Flow Capacity (cfs)	Former Basin Size (Acres)	Present Basin Size (Acres)	Peak Runoff 10-yr/24-hr Storm (cfs)
D-4	143	540.3	4.5	1.13
C-1	32	552.7	21.7	5.47

Diversion D-1 was eliminated by reconstruction of the main channel through the Goose Island area.

Should reclamation of Hardscrabble not continue according to plan, the following structures will be upgraded: Culverts C-3 and C-4 and Diversion D-6. Attached Exhibit 3.3-10 shows location and design details for upgraded structures C-3 and C-4. Design details for Culverts C-3 and C-4 and Diversion D-6 in Hardscrabble Canyon and Culverts C-3 and C-10 are provided as follows: Designs are based on information, formulae and assumptions found in Chapter VII, pp. 7-61 through 7-76.

Hardscrabble Canyon

Culvert C-3 - For undisturbed drainage area HC-3

Area: 61.3 acres

Peak Discharge: 23.18 cfs - 10-yr/24-hr storm

Try 36" cmp with 5' H.W., mitred headwall
(see attached nomograph; Figure 3.3-15)

Flow capacity about 54 cfs; adequate

Culvert C-4 - For undisturbed drainage areas HC-9, 4, 5, 3, 8

Area: 625.1 acres

Peak Discharge: 207.22 cfs - 10-yr/24-hr storm

Try 72" cmp with 15' H.W., mitred headwall
(see attached nomograph; Figure 3.3-16)

Flow capacity about 425 cfs; adequate

Diversion D-6 - From warehouse storage yard to downstream of Pond 009.
Design for 100-yr, 24-hr storm so as to eliminate need for subsequent reclamation reconstruction.

Use all characteristics for design of reclamation channel RC-5 (see MRP Figure 3.3-23, p. 3-174).

Sowbelly Canyon

Culvert C-3 - This culvert appears to be adequate at present for the 10-yr, 24-hr storm (see MRP Table 3.2-5, p. 3-111).

Culvert C-10 - To upgrade this structure a second 60" cmp will be added alongside the existing 60" cmp; doubling the capacity: 2 x 210 - 420 cfs. Needed flow is 333 cfs (see Table 3.2-5, p. 3-111).

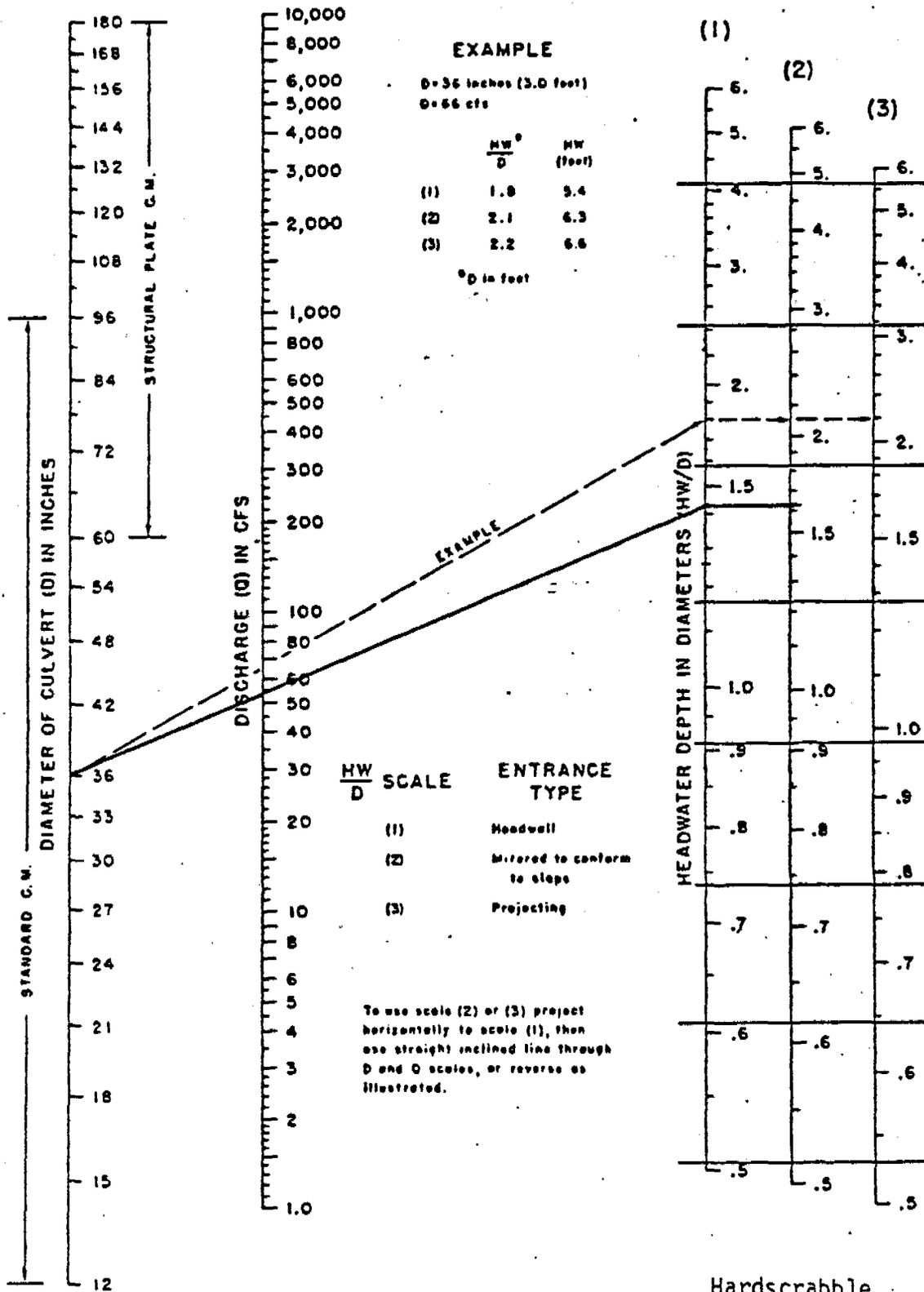
Condition No. 3

The applicant shall revise the small area exemption request to reflect additional sediment control proposals for the Sowbelly Gulch and Hardscrabble Canyon facility areas within thirty (30) days of permit approval.

With the installation of Pond 009 in Hardscrabble Canyon, there are no further small area exemption requests for the active portions of this facility.

The S.A.E.'s in Sowbelly Gulch for the substation and the chlorination facility remain in effect.

Chart 2-53: HEADWATER DEPTH FOR C.M.P. CULVERTS WITH INLET CONTROL

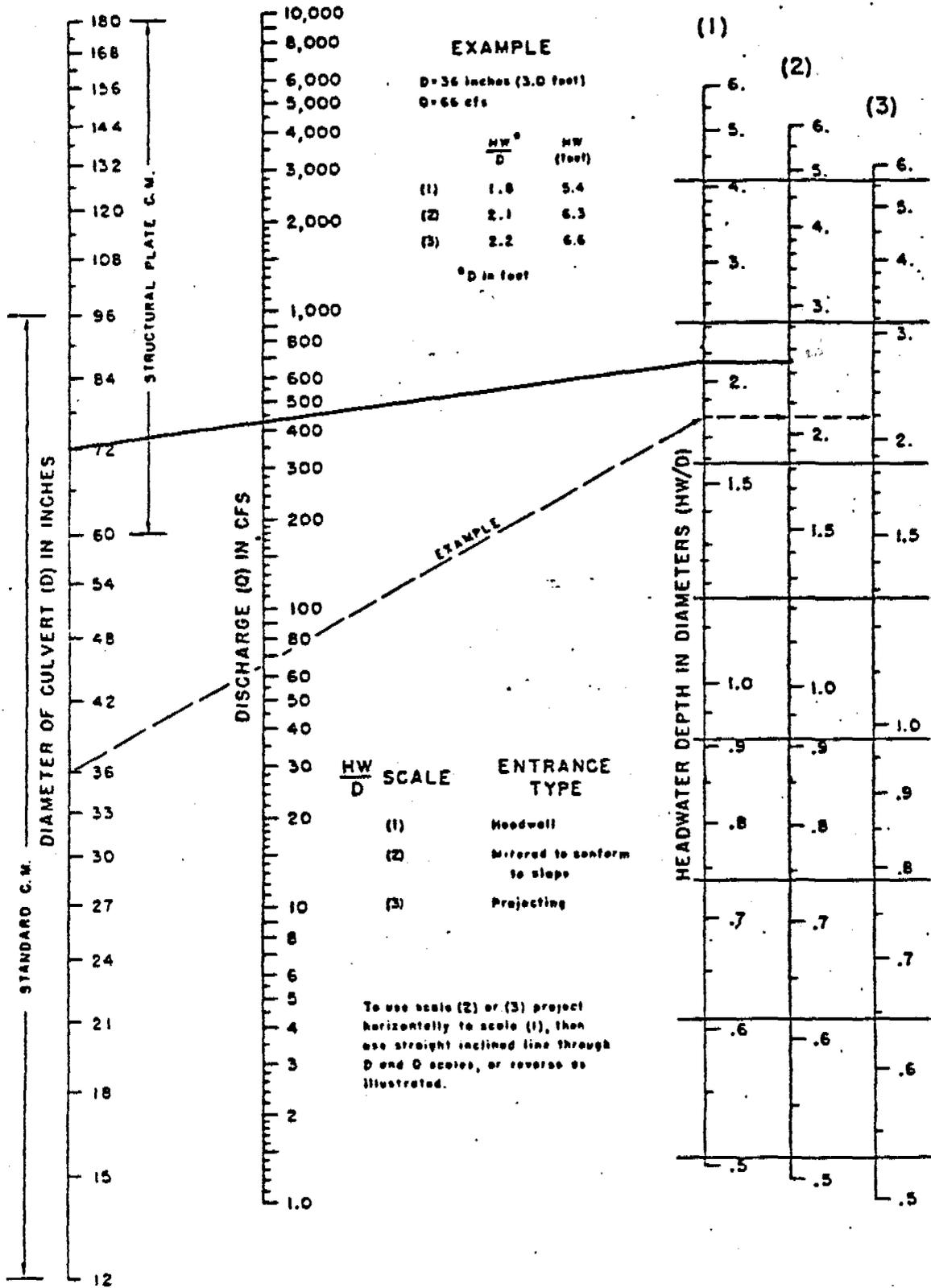


Hardscrabble

C-3

Figure 3.3-15

Chart 2-53: HEADWATER DEPTH FOR C.M.P. CULVERTS WITH INLET CONTROL



Condition No. 4

The applicant must submit a plan to evaluate the sources of oil and grease at all surface facilities and to control leakage in the surface-water system within sixty (60) days after permit approval.

The significant sources of oil and grease storage and use at Price River facilities are limited to Shop/Maintenance areas at No. 5 Mine, No. 3 Mine and Castle Gate. The No. 5 Mine and Castle Gate shops are only minor servicing facilities where the No. 3 shop handles both servicing and major repair.

It is inevitable that, during equipment maintenance and operation, small quantities of both new and waste oil will drip onto the ground. This is not considered a serious problem since surface drainage from all facilities is directed to sediment ponds. Each pond with the capability to discharge is equipped with an "oil skimmer".

A plan for the control and disposal of bulk quantities of waste oil has been in place at PRCC since 1981. A 125 gallon portable tank was provided at No. 5 Mine and Castle Gate shops. Waste oil, drained during servicing is temporarily stored in these and transported to the main waste oil storage tank at No. 3 shop facilities.

The main waste oil storage tank is a 10,000 gallon tank confined within an earthen berm. The entire capacity is never used due to limitations on quantities of spent solvents, which may be accumulated only to a total of about 300 gallons. Spent solvents may represent 1% to 10% of the total quantity of stored waste materials. As a result, a maximum of 3,000 gallons of waste oil is accumulated prior to initiating disposal.

Disposal is handled by a licensed waste oil scavenger who hauls the material to a re-processing facility in North Salt Lake City.

The main waste oil storage tank is covered by an SPCC plan.

Condition No. 5

The applicant shall demonstrate with design drawings that uncontrolled overland flows will not enter the raw water pond along the below-grade portions of the north and east perimeters of the pond. The drawings must be submitted to the regulatory authority within thirty (30) days of permit approval.

This conditions seems to require that a diversion be installed along the north and east sides of PRCC's raw water pond. A diversion would necessitate installation of a culvert, at some point under the access/county road west of the pond. All this is unnecessary, as will be demonstrated.

OSM's intent expressed by this condition appears to be based on concern over the integrity of the basin during high storm runoff inflows. Concern over the integrity of the basin is unfounded since adequate design storage exists above the normally maintained water level to contain and discharge almost twice the volume of runoff from the theoretical 100-year, 24-hour storm that could be derived from the "uncontrolled" drainage area.

As you review the following calculations, please have before you Exhibits 3.4-1 and 3.4-5, and pages 7-55 through 7-69 from Volume I, Chapter VII of the MRP.

The surface area of the raw water pond, at the invert elevation of the 18 cmp in the northwest corner, is slightly over one acre (1.094 ac.). The normal water elevation at the invert of the 18" cmp is 6,148.1 (ft. MSL). The lowest point along the basin edge is 6,151.18'. The elevation difference between normal pool level and the point of "uncontrolled" overflow is 3.08'. All inner basin slopes are 3h:1v.

The storage capacity above the 18" cmp invert is as follows:

<u>Elevation (ft.)</u>	<u>Surface Area (ac.)</u>	<u>Volume of Storage (ft.³)</u>
6,148.1	1.094	-0-
6,149.1	1,108	47,959.6
6,150.1	1,123	48,591.2
6,151.1	1,137	49,222.8

Total volume of storage - 145,773.6 ft.³

Let us assume that only capacity below elevation 6,150.1 be considered so as to retain 1.08' freeboard. The total capacity is then 96,550.8 ft.³

The uncontrolled drainage area of the raw water pond could be about 50 acres, however it is not, since a road cut many years ago above the old refuse pile shown in the upper left quadrant of Exhibit 3.4-1 effectively diverts about 1/2 of this area to the north, across the county road and to the Price River. Twenty-five (25) acres will be used for runoff volume calculations.

Runoff volume is calculated by

$$Q = CiA$$

Where C = coefficient of runoff
 i = 24-hr. rainfall in inches
 A = drainage area in acres

STORM RUNOFF VOLUMES

<u>Storm</u>	<u>i Rainfall (in.)</u>	<u>C</u>	<u>A (ac)</u>	<u>*AC/Ft⁰</u>	<u>**Ft³</u>
10-yr/24-hr	1.9	0.10	25	0.396	17,250
25-yr/24-hr	2.3	0.15	25	0.719	31,320
100-yr/24-hr	2.9	0.20	25	0.21	52,708

$$* \frac{(CiA)}{12} = \text{Ac/Ft}$$

$$** 43,560 (\text{Ac/Ft}) = \text{Ft}^3$$

As previously shown we have 96,550 ft³ storage capacity; 43,842 ft³ above that needed for the 100-year/24-hour storm. This amount may be significantly greater, on any given day, since we draw the water level of the basin down about 3', through use in processing, before refilling.

Assuming the pool elevation to be at 6,148.10 on the day that a 100-year/24-hour storm occurs the level would raise just over 1 foot. The excess would be slowly discharged to the Price River at a rate averaging about 1 cfs and require about 14½ hours. Should we also open the plant intake on the southwest corner of the pond, we could increase the draw down by 2/3 cfs; 8 3/4 hours to eliminate the excess.

In the event that we were to install a diversion, such a structure would be designed for the 10-year/24-hour storm. As you may see, the 10-year would produce a comparatively small amount of runoff (17,250 ft³). Raising the normal pool elevation 4-5 inches, which would certainly not affect the integrity of the basin.

Condition No. 5 is not only costly and unnecessary from a safety or hydrological standpoint, it would also increase the potential for contributions of additional sediments to the Price River. We would hope that you can eliminate this condition.

Condition No. 6

The applicant shall comply with and meet the requirements contained in the Hydrology Monitoring Plan of the Technical and Environmental Assessment.

Excerpt from Hydrologic Monitoring Plan (Attachment III)

... "The report should note seepage areas in the mine that cannot be measured."

The foregoing statement has been added by your office to our May 1984 submittal. It is impractical in that several weeks would be required during each monitoring period to hike through and search all entries for wet spots. A liberal interpretation of this statement could have us locating everything from condensation dripping from a roof bolt to a leaky belt spray nozzle. We cannot conceive the possible use of such information.

Condition No. 7

At such time that OSM, in consultation with the Division of Oil, Gas and Mining and the SHPO, determines that subsidence within the permit area may adversely affect known or unrecorded cultural sites, additional cultural resource studies may be required. This determination will be based on new subsidence and/or cultural resource information, and clear justification will be presented to the applicant.

Accepted.

Condition No. 8

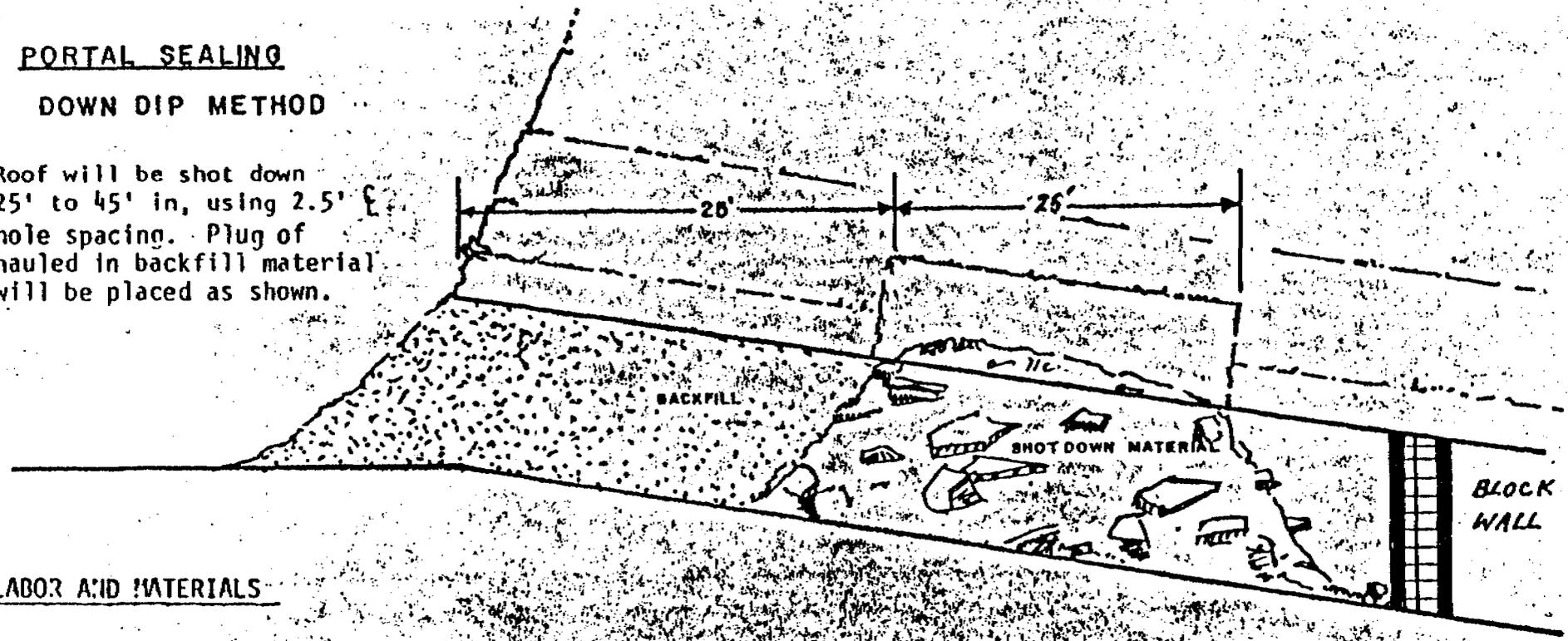
Prior to any additional disturbance, the operator must conduct adequate raptor surveys. The applicant must contact the U. S. Fish and Wildlife Service for guidance on proper raptor survey techniques. Results of the surveys shall be submitted to the regulatory authority for approval.

Accepted.

REVISIONS
REVISED 12-24-83 RW

PORTAL SEALING DOWN DIP METHOD

Roof will be shot down 25' to 45' in, using 2.5' hole spacing. Plug of hauled in backfill material will be placed as shown.



LABOR AND MATERIALS

Blasting - 20' x 20' x 6' area
@ 2.5' hole pattern = 64 holes

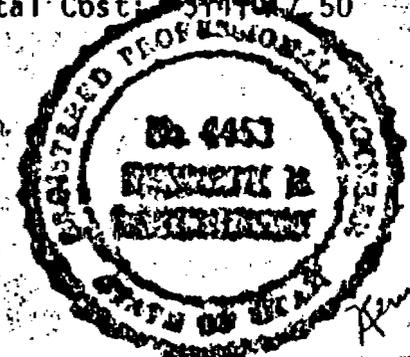
Hole Drilling: 1 man, 1 shift =	\$ 150.00
Compressor & Stoper	300.00
Loading & Shooting: 1 man, 1 shift =	150.00
Powder	100.00
Caps	100.00
Shot Hire	2.50

NOTE: There are 7 down dip portals on the permit area.

Total Cost: \$1,017.50

Backfilling

250 yds ³ hauled and placed @ \$4.80/yd ³ =	1,200.00
TOTAL	\$2,002.50



Kenneth B. Hackett



PRICE RIVER COAL COMPANY
ENGINEERING DEPARTMENT
HELPER, UTAH

A

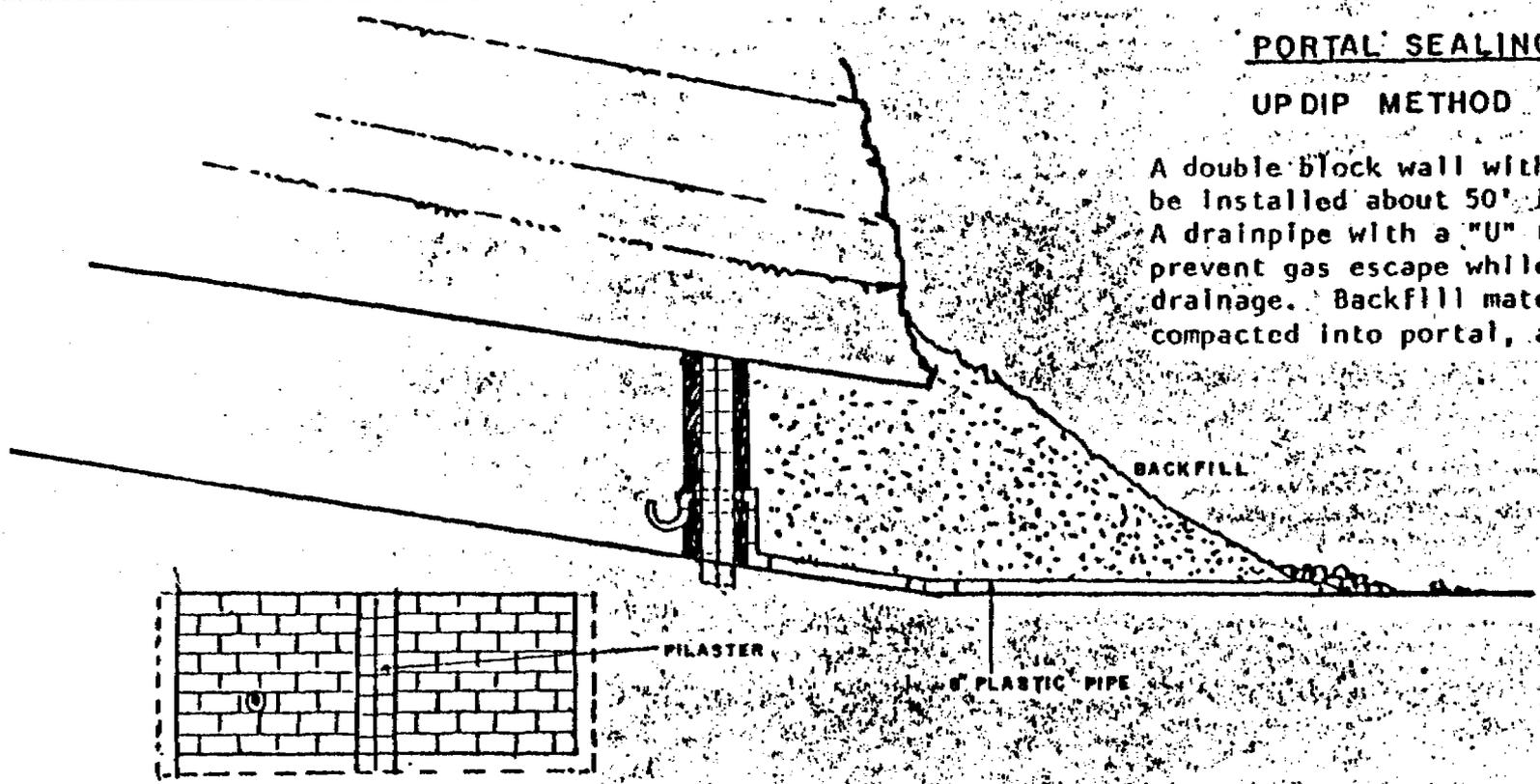
RW 1/10/83

REVISIONS

REVISED 12-31-82 RW

PORTAL SEALING UP DIP METHOD

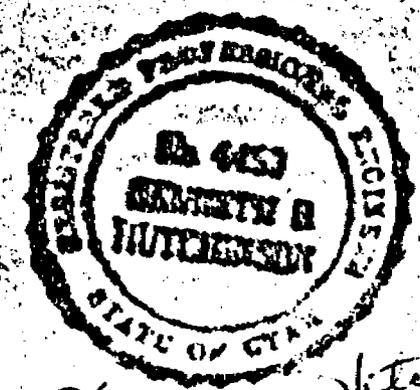
A double block wall with pilaster will be installed about 50' into portal. A drainpipe with a "U" tube inlet will prevent gas escape while allowing drainage. Backfill material will be compacted into portal, against wall.



COSTS

1. <u>Build Wall - 9' X 22'</u>			
A.	520 blocks @ 76¢ ea.	=	\$ 390.00
	Labor - 2 men, 1 shift	=	300.00
B.	<u>Sealing Wall</u>		
	4 bags mortar @ \$10/ea.	=	40.00
	4 bags cement @ \$20/ea.	=	80.00
	Labor - 1 man, 1/2 shift	=	75.00
	Subtotal		\$ 885.00
2. <u>Install "U" Tube and Discharge Pipe</u>			
	35', 6" pipe @ \$4.00/ft. installed	=	140.00
	6" plastic "U" tube assembly	=	150.00
	Installation: 1 man, 1/2 shift	=	75.00
	Subtotal		365.00
3. <u>Backfill</u>			
	200 yds of material hauled and pushed into place @ \$4.80/yd ³	=	960.00
	TOTAL		\$2,210.00

NOTE: Two up dip portal seals on property will cost \$4,420.00.



Kenneth B. Hutchinson



PRICE RIVER COAL COMPANY
ENGINEERING DEPARTMENT
HELPER, UTAH

A
DRAWING NUMBER

Condition No. 9

Within ninety (90) days of permit approval, the applicant must submit a permanent portal-sealing plan for approval by the regulatory authority. The applicant must also notify the Bureau of Land Management to arrange for on-site inspections and reviews between management and personnel from the Branch of Solid Minerals at least ninety (90) days prior to the proposed closing date of any portal.

The portal sealing plan included in PRCC's MRP (pp. 3-62, 3-63) has been reviewed with BLM's Allen Vance in the Price Utah office (11-84) and is changed according to the attached replacement Figures 3.1-3 and 3.1-4.

PRCC will make the proper notification to BLM regarding sealing of portals.

Condition No. 10

The applicant shall comply with applicable federal, state and local laws, rules, and regulations which impose duties with regard to socioeconomic analyses and/or mitigation plans that are required to be submitted prior to project expansion. Such analyses and plans shall be developed and implemented in consultation with affected local governments, the Utah State Department of Community and Economic Development (UDCED) and OSM. In order to determine when such plans and analyses should be submitted, the applicant shall submit on an annual basis to OSM, Carbon County and the UDCED an update of its current and projected workforce figures.

In compliance to this condition we are providing our present and projected workforce figures.

Present Employment - October 31, 1984

Mine Employees.....170
Construction Workers..... 12
Total Employment.....182

Projected Employment

<u>Year</u>	<u>1985</u>	<u>1986</u>	<u>1987</u>	<u>1988</u>	<u>1989</u>
Mine	170	170	170	170	170
Construction	12	-0-	-0-	-0-	-0-
Total	182	170	170	170	170

Condition No. 11

The applicant shall participate in the U. S. Fish and Wildlife Service study program "Recovery of Endangered Fishes of the Upper Colorado River Basin", as determined necessary by the Service.

Regarding permit condition No. 11, the U. S. Fish and Wildlife Service has determined that Price River Coal Company must participate in the study program "Recovery of Endangered Fishes of the Upper Colorado River Basin." The extent of this participation is a one-time contribution of \$641.00 to the study program based on surface-water depletion. This has been discussed with Mr. Rob Wiley of your staff on several occasions.

"Mr. G. L. Buterbaugh
Regional Director
U.S. Fish and Wildlife Service
P. O. Box 25486, DFC
Denver, Colorado 80225

Dear Mr. Buterbaugh:

Enclosed is a check for \$641.00 payable to the Fish and Wildlife Service (FWS) from Price River Coal Company (PRCC), for their contribution to the conservation fund for endangered fishes in the Upper Colorado River Basin. This amount was specified in a memorandum from the FWS to OSM on September 12, 1984. The Surface Mining Control and Reclamation Act (SMCRA) permit requires (Condition No. 11) PRCC to contribute to the conservation fund. Please acknowledge acceptance of this contribution so we can make the determination that PRCC is in compliance with this condition of their permit.

If you or your staff have any questions, please contact either Mark Humphrey or Walter Swain at (303) 844-3806.

Sincerely,

/s/ Richard E. Dawes for

Allen D. Klein
Administrator
Western Technical Center"