

0008

*asey mine file
cc BRW
K. May*



**CASTLE
GATE**
COAL COMPANY

Richard
RECEIVED
JUN 13 1988

DIVISION OF
OIL, GAS & MINING

June 10, 1988

Dr. Dianne R. Nielson
Director
Division of Oil, Gas, & Mining
3 Triad Center, Suite 350
Salt Lake City, UT 84180-1203

Dear Dr. Nielson:

Thank you for your time both at the meeting in April and investigating the requests made by the Division staff. I feel that you have at least turned down the heat which has been generated. The tone of your May 24th letter reflects this.

The requests made by the Division staff in the February 19th comment letter contained both legal and engineering comments. As I explained at our meeting last April 29, as an engineer I can solve the engineering problems. I gave to the Division answers, new maps and text which solved the engineering concerns of the Division on April 28th. If there are more reasonable specific questions or problems, I would be glad to look into them.

In order to solve an engineering problem the Division staff must be specific. For example, the statements by the Division that there is not specificity in hydrologic design calculations and backup for the assumptions or the reclamation plan lacks sufficient detail, are too general to address as an engineering problem.

I have looked through the hydrologic design sections of the permit on a page by page basis. I can honestly say there is nothing wrong with the methodology or assumptions used by the engineer who designed the systems. The methodology and assumptions are well documented in Chapter VII. If the existing systems are evaluated on a performance basis, none of them have failed which is the goal of a design engineer. If the Division can point out specific design flaws or failures, I would be more than happy to address them immediately.

As for the reclamation plan, there is no end to the detail which could be incorporated. The question which I have to ask myself is whether I could reclaim the sites given the existing plans. The answer to that question is yes. The reclamation plans for the 120 acres of

cc5.rha603a

surface disturbance are on 1" = 200' scale maps. All of the reclamation plans which I have worked on in the midwest were on 1" = 500' scale drawings encompassing 3,000 plus acres. The detail of these drawings was much less than the existing drawings which the Division now has in Castle Gate's permit.

The detail of cross sections and maps was evidently a problem back in 1983 as page 29 of Chapter VIII states, "A general agreement was reached during a joint meeting with DOGM, OSM, their consultants and PRCC on January 13, 1983, that cross sections were unnecessary for sites where backfilling and grading was not proposed. A follow up letter from PRCC on 1/13/83 confirmed that cross sections were only to be provided for existing and proposed stream channels (which were provided on 6/9/83)". The next paragraph goes on to say, "PRCC Mining and Reclamation Plan (now CGCC) was determined to be "complete" on 10/5/83 indicating that all requested information, including any dealing with backfilling had been provided". As you can read into these paragraphs, the Division had lengthy meetings and correspondence with PRCC about the adequacy of maps and cross sections. I do not intend to reopen an issue which has already been solved and incorporated into a legal document.

Please note that Castle Gate Coal Company will address in accordance with Utah 40-10-12(3) and UMC 788.11 (2), any specific problems that the Division uncovers during their review. I would expect this to be in the form of a map number, specific sediment pond or ditch. Curve numbers, sediment pond sizes, culverts, etc., were previously submitted and approved and should not need additional justification unless there are specific problems.

Thank you for your time and effort on the problem. I am willing to meet with the Division staff to discuss a specific problem which might be uncovered in their review.

Sincerely,


Richard H. Allison, Jr., P.E.
Project Supervisor

RHA:jcr
cc: Bob Evans
Dave Miller
Chrono

Steve Youngbauer
DOGM File

cc5.rha603a