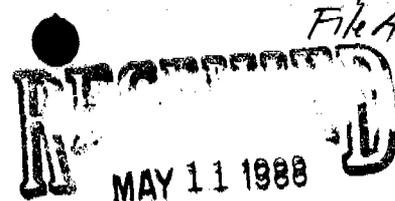


0012



**CASTLE  
GATE**  
COAL COMPANY



DIVISION OF  
OIL, GAS & MINING

May 9, 1988

Mr. D. Wayne Hedberg  
Data Management Coordinator  
Division of Oil, Gas & Mining  
3 Triad Center, Suite 350  
Salt Lake City, UT 84180-1203

Dear Mr. Hedberg:

The following are Castle Gate Coal Company responses to the review of the conditional approval response letter dated 6 April 1988.

Comment: UMC 817.160 Class I Roads - JRH

Response:

1. The word temporary has been removed from the maps. The text still states that the bridge will be used for the life of the mine.
2. The comment that the bridge should be capable of passing a 100-year/24-hour storm event already exists in the permit. Page 32 of the permit addresses the bridge alternative. As stated in the permit, the highest recorded reading at the Heiner Station on the Price River was 2,620 CFS on April 28, 1952. This recording station is below the Willow Creek tributary, so lower flows would be expected at the unit train loadout access bridge. Prudent engineering judgment would point to this number as a 100-year/24-hour event. As the permit states in the subdivided area rating program on Page 39, 2,639 CFS reaches a peak elevation at 6,144.5. This is 5.5' below the bottom chord on the bridge. Therefore, the bridge is capable of passing a 100-year/24-hour storm event.
3. The reclamation plan in 3.8-2 will be followed as stated on Page 34. The division will have to be more clear as to what is needed as a description of operation and maintenance. The bridge alternative was chosen because it is maintenance free.
4. The disturbed area boundary is shown on Aerial Photo 3.4-1 and Map 3.8-5. The plan view Map 3.8-5 has been extended across the river. The stream buffer zone is shown on Map 3.4-1.

Mr. D. Wayne Hedberg  
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Comment: UMC 784.13(b)(5)(i)...(ii) Lynn Kunzler

Response:

Narrow leaf cottonwood will be replaced as required. UMC 783.10, Page 3 states that Castle Gate Coal will replace 6" or larger diameter trees which would be removed to cross the river. Thus the statement "as required" in seeding list. No 6" or larger trees were removed during construction.

The construction of the loadout was not completed until January 1988 which was past the seeding season. The site was seeded, fertilized and mulched in March of 1988.

Comment: UMC 817.42 Hydrologic Balance- Kent Wheeler

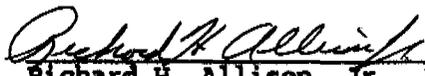
Response:

1. Section 3.8-4, Page 11 addresses a small area exemption. As stated in this section:
  - a) During construction the construction site will be perimetered with sediment fence.
  - b) After construction the area will be seeded, fertilized and mulched. A sentence was added to Section 3.8-4, Page 11 (attachment 1) which states: When the grass cover is sufficient to prevent erosion, the sediment control fence will be removed.
  - c) The unit train loadout has a concrete apron which channels water to a 10,000 gallon sump. The text has been changed to state the sump will be cleaned out as necessary with a syphon truck. The water and material will be dumped into Pond 011.

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May 9, 1988  
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2. Exhibit 3.8-5 has been modified to show the temporary sediment control fence.

Sincerely,

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

RHA:jcr

Attachment

xc: Steve Youngbauer (w/attachment)

cc5.rha509