

AMAX COAL COMPANY

A Subsidiary of AMAX Coal Industries, Inc.



March 24, 1992

BELLE AYR MINE

Ms. Sharon Falvey
Utah Division of Oil, Gas and Mining
3 Triad Center, Suite 350
Salt Lake City, UT 84180-1203

RE: Castle Gate Mine Sediment Ponds

Dear Sharon:

Thank you for your time last Monday, March 16, to discuss the Castle Gate Mine sediment ponds. After talking with you, I can now better understand your concerns.

Based on our discussion about Pond 12B, I understand the following items are the specific concerns in the general statement to demonstrate compliance pursuant to NOV 92-28-1-1, remedial action item #2.

- 1) The Division has a concern that the as-built storage above the primary inlet does not provide adequate freeboard during a design storm event. The Division feels that the as-built pond is significantly different than the approved design which could cause the hydraulic model to be in error.
- 2) The as-built drawing of Pond 12B does not extend far enough into the inlet ditch to adequately show the topography.

In order to demonstrate that Pond 12B has adequate freeboard and will perform as designed, I have retained EarthFax Consultants to model the as-built pond. Carol Bjork will be contacting you directly to talk about this pond and others which you have expressed concerns about their freeboard adequacy. Carol will explain the programs she uses to route a storm event through the ponds and their tolerances.

If Pond 12B requires any additional work because of inadequacies shown in Carol's model, EIS has been contracted to correct any problems. This work will be done pursuant to remedial action item #4 in NOV 92-28-1-1.

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OIL GAS & MINING**

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I have also contacted Dan Guy of Blackhawk Engineering. Blackhawk did the as-built drawings of Pond 12B. They will update the map to include the topography of the inlet to the pond.

Sincerely,



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

RHA:vsn
cg003

cc: Phil Dinsmoor
Steve Laird
George Womack - Denver