

0035

007/004 #2
AMAX COAL WEST, INC.

A Subsidiary of AMAX Coal Industries, Inc.



May 5, 1993

Belle Ayr Mine

RECEIVED

MAY 10 1993

DIVISION OF
OIL GAS & MINING

Mr. Daron Haddock
Utah Division of Oil, Gas & Mining
3 Triad Center, Suite 350
Salt Lake City, UT 84180-1203

RE: Division Order 92A Responses

Dear Daron:

Pursuant to your letter dated 9 April, 1993 I retained Earthfax Engineering to calculate the probability of pond 009 discharging during the next 18 months of reclamation. Two copies of the calculations performed by Mr. Bill Hendrickson are attached to this letter. Mr. Hendrickson's calculations show that there is a 22 percent chance of pond 009 discharging within the next 18 months.

I did not ask Mr. Hendrickson to calculate the probability of discharge for ponds 007 and 008 because they will contain a 10 year/24 hour storm event. However the calculation is simple and results in a 15 percent chance that these two ponds will discharge during reclamation.

The chance of these ponds discharging is very remote and the chance of discharged water which fails to meet NPDES standards is even less. The ponds in Hardscrabble Canyon have never discharged in the past twelve years of their existence. This is due to the high infiltration rates of the soils in the Canyon floor which cannot be taken into consideration in the runoff calculations.

The submittal of this information and the commitment by AMAX to reclaim the mine fulfills the requirements for the completion of Division Order 92A.

Sincerely,

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

RHA:plc
cg057

cc: Tom Lien
Steve Laird
Pat Winmill - Parsons Behle & Latimer
Bill Hendrickson - Earthfax