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*ACT/007/005  
#2 → #3*

September 18, 1985

*Mine file  
LNB  
D.W. Hebbony*

Subsidiary of  
Coastal States  
Energy Company

**RECEIVED**

**SEP 23 1985**

**DIVISION OF OIL  
GAS & MINING**

Mr. Lowell P. Braxton  
Mined Land Reclamation Administration  
DIVISION OF OIL, GAS & MINING  
355 West North Temple  
3 Triad Center, Suite 350  
Salt Lake City, Utah 84180-1203

Re: Minor Modification - Skyline Mine M&RP - Small Area Exemption  
Along Truck Haul Route at Railroad Loadout Area

Dear Mr. Braxton:

We wish to apply for a small drainage area exemption along our truck haul route at the railroad loadout area as shown on the attached map. This road is currently unpaved with the surface drainage water reporting to the sedimentation pond. We are in the process of issuing a contract to have this road paved within the next few weeks.

We are proposing to remove the berms along the road's edge for the area shown and allow the run-off from the paved surface leave the paving and enter the natural drainage system. Our alternate method of treatment for this water would be: (1) Paving the running surface of the haul road with a minimum of 3½" bituminous surface and (2) Cover the road shoulders from the paved surface to the revegetated slope with clean washed gravel or ballast material. We feel that this will accomplish at least four things: (1) Since the entire surface is covered with either pavement or clean gravel, erosion from the area will be absolutely minimal, (2) Water leaving the area should be of good quality since there will be no exposed soil surfaces, (3) Potential fugitive dust will be completely eliminated, and (4) Road maintenance will be minimal as the sub-grade will be kept free of water.

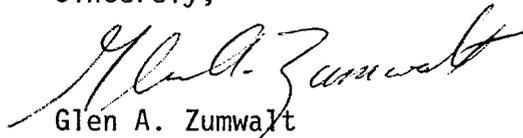
What we are proposing is a good engineering practice and is being done primarily to eliminate degradation to the environment by air and water pollution as well as to reduce road maintenance costs. We feel that leaving the berms along a paved road will allow water to enter the sub-grade and thus create a significant road maintenance problem as well as affecting the surface drainage. The surface drainage would be altered in that as the surface water is collected along the berms, the volumes and velocities will increase so that as it leaves the paved

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area and flows over the exposed soil surface, the increased energy will create additional soil movement. We feel that both of these problems can be avoided by eliminating the berms. What we are proposing is not experimental or new but rather a standard construction method that has been used on paved roads throughout the United States.

We are enclosing four copies of the location map and a cross section of the road for your review. We would appreciate a reply by September 25 as a contractor will be starting at that time.

Sincerely,



Glen A. Zumwalt  
Vice President & General Manager

GAZ:KZ:jsg

Enclosure

cc: Ken May