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Utah Fuel Company

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**DIVISION OF OIL
GAS & MINING**
September 6, 1985

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Subsidiary of
Coastal States
Energy Company

ACT/007/005
#3

Lowell P. Braxton, Administrator
Division of Oil Gas & Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, UT 84180-1203

**RE: Conditional Approval for Removal & Disposal of
Sediment from Sedimentation Pond.**

Dear Mr. ^{Lowell}Braxton:

On August 22 I received the Divisions August 14 conditional approval for the removal and disposal of the sediment from the sedimentation pond. On Friday, August 23, I called Ira Hatch, District Ranger for the U.S. Forest Service, and discussed with him the cleaning and disposal of the sediment from the sedimentation pond. He indicated that he had responded to the proposal and had no reservations for the plan. I asked if he had any problems with us proceeding with cleaning and disposing of the sediments from the sedimentation pond and he said he didn't. I then called you and discussed the conditions of the approval and agreed on the items as follows:

Condition 1: Utah Fuel will not dispose of the sediment until the Division has received a copy of the sample analysis which demonstrates its non-toxicity.

Response: A copy of the toxicity report of the sediments from the sedimentation pond was hand delivered to you by Keith Welch of our Midvale office. You acknowledged receiving this report.

Condition 2: The surface drainage ditch discussed in paragraph 3 of the July 22 letter must be sized equal to or greater than the existing ditch (trench).

Response: I agreed that when the new ditch was constructed that it would be sized and be equal or greater than that needed to handle potential surface run-off. Although not discussed with you that morning, I would like to clarify a couple of points concerning this drainage ditch. First, the existing ditch consisted of the entire trench, which was from 15-25 feet wide and 4-8 feet deep. I do not want to give the impression that we will construct a ditch of these dimensions. The ditch will be sized to carry the expected run-off and will not be equal or greater than

the existing ditch (trench). Second, although not stated in our July 23 letter or discussed over the phone, we did not ever plan to construct this new ditch before filling in the trench underneath BC-12 conveyor. The reason for this is that the ditch is to be constructed on the side of the trench where the trucks will be unloading. If we constructed the ditch first, the trucks would have to back through the ditch in order to get to the trench and unload the sedimentation pond slimes. This would greatly hamper the disposal process and perhaps preclude disposal at this site. The question has been asked "Why not dump from the south side of the trench?". The road on the south side of the trench has a 8-10% grade. It is impossible to dump from this grade without high degree of risk of either tipping a truck over or bending the lifting rams on the trucks. Dump trucks need a nearly level surface to dump from.

Condition 3: Utah Fuel must notify the Division prior to disposal of excess sediment to the waste rock disposal area as to the quantity of the excess and the anticipated haul date.

Response: When we discussed this item, I indicated to you that the sediments in the sedimentation pond appeared to be considerably more slimy than we had originally anticipated. With this in mind, we plan on simultaneously disposing of these slimes at both locations so as to increase evaporation from the slimes. We did not intend to completely fill up the trench underneath BC-12 if the sediments were extremely wet, as this would create potential operational problems. You then asked how much sediment we plan on hauling to the Scofield rock disposal site, and I indicated that I would estimate approximately 2,000 yards.

Condition 4: The survey of the sediment pond must be conducted while the pond is empty. The survey report must be submitted before September 14, 1985. Any requests for time extensions must be received in writing prior to this date.

Response: I indicated that we had scheduled Olympus Aerial Surveys to fly the area on August 30 and that they would be making a contour map from that flight for us. We have now been informed by Olympus that they were unable to take the necessary photos on August 30 due to cloud cover. The photo's were finally taken on September 5. Because of the delay in obtaining the photo, we will not be able to meet the September 14 date. We would like to request a ten (10) day extension and submit this map by September 24.

Condition 5: The USFS has expressed an interest in commenting on this proposal. The Division forwarded a copy of the July 23 proposal to the Price District Office on July 30, 1985.

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Prior to proceeding with implementation of this proposal, the operator must obtain approval from the local Forest Service land managing agency.

Response: I reviewed the discussion that I had with District Ranger, Ira Hatch, with you. ~~You indicated to me that your office had not received any reply from the Forest Service and that you would contact the Forest Service by telephone.~~ Sometime Friday afternoon I received a telephone message from you saying that our plan was approved and that we could proceed with cleaning out the pond. *

We appreciate your cooperation in this approval. If you need additional information, please contact me.

Sincerely,



Keith W. Zobell
Environmental Engineer

KWZ:gm

See items 1 & 2 file memo LRB/fibs 8.26.85