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Glen A. Zumwalt  
Vice President and  
General Manager



**Utah Fuel  
Company**

P.O. Box 719  
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(801) 637-7925 or  
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June 29, 1985

*orig mine file 013*  
*Dr. A. Pruitt*  
*M. Earl*  
*L. Braxton*  
*Dr. P. Daniels*  
Subsidiary of  
Coastal States  
Energy Company

RECEIVED

JUL 01 1985

DIVISION OF OIL  
GAS & MINING

*AC/1007/005*  
*#7*

Dr. Dianne Nielson, Director  
DIVISION OF OIL, GAS & MINING  
355 West Temple  
3 Triad Center, Suite 350  
Salt Lake City, Utah 84180-1203

Re: Abatement of Notice of Violation 85-2-7-2, 1 of 2

Dear Dr. Nielson:

For abatement of Notice of Violation 85-2-7-2, 1 of 2, we have reviewed our approved plans for open coal storage and feel that we are in compliance with these plans. On December 17, 1984, Keith Zobell met with your permitting division and discussed a proposed modification to our M&RP to allow open coal storage at our mine site.

On December 20, 1984, we submitted a request for a minor modification to our approved M&RP for permanent open coal storage here at the mine site. In our submittal we stated: "Actual capacity will depend upon such factors as height, compaction, fill slope and safe working practices. Drainage will be provided on both sides of the pile and will direct run-off water into the established surface drainage system." A copy of this submittal (Exhibit #1) is attached and is highlighted.

On January 17, 1985 Keith Zobell again met with your permitting division and discussed our needs for additional temporary coal storage. In both this meeting and the December 11th meeting our development of the coal storage areas was discussed as was input from DOGM. On January 22, 1985 we submitted a request for approval for Temporary Coal Storage. In this letter we stated: "The development of the Temporary Storage would start by bringing the Temporary Coal Storage Area #2 up to the level of the RDA road. We show three cross sections of the coal storage areas." A copy of this letter is attached (Exhibit #2) and is highlighted.

On February 6, 1985 we submitted a deficiency report to your office for the permanent open coal storage areas. In this letter we committed to "the coal storage areas will have a drainage ditch constructed around the perimeter as shown on Map 6-a. Coal will be placed on the prepared base and the pile built up to an approximate height of 35 feet." A copy of the letter is attached and marked Exhibit #3.

Dr. Dianne Nielson, Director  
June 29, 1985  
Page two

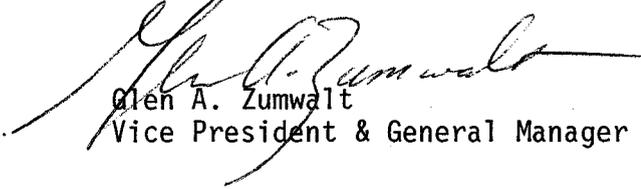
On February 8, 1985 we submitted a deficiency report to your office for Temporary Coal Storage. In this letter we committed to "the two coal storage areas will have a drainage ditch constructed around the perimeter and a culvert placed under the pile as shown on Map 6-b. Coal will be placed on the prepared base and the pile built up to an approximate height of 45 feet." Also attached to this letter was a sketch map showing the haul route. A copy of this letter is attached (Exhibit #4) and is highlighted. We have also enclosed a copy of Map 6-b.

As we understand it, the basis for NOV 85-2-7-2, 1 of 2, is that the coal stored in Temporary Coal Storage Area #2 exceeds the height of the RDA road. Cross section C-C' is at the upper end of Temporary Coal Storage Area #2 and at this point the coal storage does not exceed the height of the RDA road. A recent survey of this area showed that the main coal pile elevation is 22 feet above the ground level. To the north of the cross-section C-C' there is some coal stored higher than the main coal pile up to an elevation of 34 feet above ground level.

Although it is not clearly shown on Map 3-6b, we are committed in our February 6th and February 8th letters to having drainage around the perimeter of the total storage. We have constructed this drainage around the perimeter.

We have committed to and constructed adequate drainage. We have not exceeded the height or total tonnage limitations. We, therefore, feel that we are not in violation of the approved operational plans. We further feel that NOV 85-2-7-2, 1 of 2, was issued in error and request that it be vacated.

Sincerely,



Glen A. Zumwalt  
Vice President & General Manager

GAZ:KZ:jsg

Enclosures

CRUSHED COAL STORAGE

During the initial stage of the mining operations, the permanent coal storage facilities will not have been completed. After completed analysis, it has been determined that the construction of permanent facilities should be delayed to the fourth year of production. Initial storage will consist of a temporary ground storage area. Front-end loaders will be utilized to convey coal to the train loading facility. The temporary ground storage will have an expected life of about three years. During this period, the mine production will increase from 437,000 tons per year to 2,301,000 tons per year. It is anticipated that the temporary storage area could range in capacity from 10,000 tons to 20,000 tons depending upon train shipments. Presently, the train shipments are not envisioned as unit trains, but will consist of shipments of 10 to 50 cars.

The permanent coal storage facility will initially consist of two 15,000-ton-capacity concrete silos, with construction of two additional 15,000-ton-capacity silos at a later date as additional storage capacity is needed. The bottom of each silo will be furnished with seven vibrating feeders (four at a constant discharge rate of 750 tons/hr; three at a variable controlled rate of 100 to 500 tons/hr). These feeders will deliver carried loads to an 84-inch-wide conveyor transporting coal to the train loading system.

\*Two ground storage areas will be established (location shown on Map 3-6a). They will be used on an as-needed basis. The south storage area will hold approximately 37,500 tons and the north storage area will hold approximately 75,000 tons. Actual capacity will depend upon such factors as height, compaction, fill slope and safe working practices. It is not planned for the pile to encroach onto the adjacent cut slopes. Volumes will be consistent with and in compliance with PSD regulations. Drainage will be provided on both sides of the pile and will direct run-off water into the established surface drainage system.

REPLACES	TEXT
Section 3.2 Page 3-38 Date 9/22/80	Section 3.2 Page 38 Date 12/20/84

\* Denotes changes or additions

EXHIBIT 2



**Utah Fuel  
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P.O. Box 719  
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Subsidiary of  
Coastal States  
Energy Company

January 22, 1985

Mr. D. Wayne Hedburg  
Permit Supervisor/Reclamation Hydrologist  
DIVISION OF OIL, GAS & MINING  
355 West North Temple  
3 Triad Center, Suite 350  
Salt Lake City, Utah 84180-1203

Re: Temporary Coal Storage

Dear Wayne:

On December 21, 1984 we submitted a modification to the Skyline M&RP for permanent open coal storage areas. The north coal storage area has been used as a storage area for construction materials. A considerable amount of materials still remain in the area. These materials are now covered with three feet of snow. We feel that for us to clear the snow off of the area would result in a significant loss of valuable materials. We therefore would like to establish a temporary coal storage area.

Attached are six copies of a map showing proposed temporary coal storage areas. We are requesting this as a temporary ammendment measure.

This temporary coal stoage will be done in conjunction with coal storage on the permanent south coal storage area. We would like to start using these temporary areas within the immediate future. The temporary areas would be used during 1985 and 1986. Sometime during 1986 we plan on starting up Mine No. 1. The majority of the temporary coal pile is in front of the Mine No. 1 portals. The coal will have to be moved before we can open up this mine. Temporary coal stored in area #2 would be moved within the same time frame.

It is estimated that temporary areas will hold approximately 74,000 tons. The total storage of the temporary and south permanent storage areas will not exceed 112,500 tons.

Mr. D. Wayne Hedburg  
January 22, 1985  
Page Two

The development of the temporary storage would start by bringing the temporary coal storage area #2 up to the level of the RDA road. The coal trucks would then proceed onto the south permanent coal storage area and then onto the temporary storage area #1. We have shown three cross sections of the coal storage areas.

The drainage is also shown on the attached map. The 24" culverts are more than adequate to handle the 10 year, 24-hour event. The total area involved in the south permanent and temporary storage area is 3.76 acres. Precipitation from a 24-hour, 10 year rainstorm is expected to be 2.45 inches. After infiltration, surface runoff from a storm of this intensity should be 1.50 inches, based on the assumption that land surface will be similar to gravel and dirt roads with SCS runoff curve numbers of about 90. This would result in a runoff volume of .24 CFS from the storage areas. The undisturbed drainage around the mine site will not be impacted.

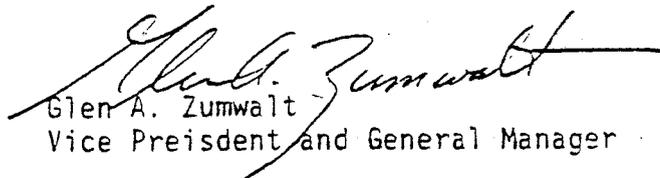
Temporary storage area #2 is the fill slope of the RDA road and was seeded at the end of the road construction in the fall of 1983. Germination occurred in the spring of 1984 and resulted in a fair stand at the end of the growing season. The piling of coal on this slope will destroy this vegetation. When this coal storage is moved the slope will have as much of the coal removed as practical and then slope will be seeded on a minimum of six inches of topsoil with the approved seed mixture. Seeding will be done in either the spring or fall, whichever ever occurs first. The required soil will come from the excess topsoil in our stockpile. This excess is a result of the debris flows in the North Fork. There are no existing vegetation studies in this area.

Temporary storage area #1 will have no impact on any revegetation areas. Neither of the temporary areas will disturb any undisturbed areas.

We feel that this temporary coal storage will create a minimum impact on the existing environment.

If you need any additional information, contact Keith Zobell.

Sincerely,

  
Glen A. Zumwalt  
Vice President and General Manager

GAZ:KWZ:ss

Attachments



Utah Fuel  
Company

P.O. Box 719  
Helper, Utah 84526  
(801) 566-7111

Subsidiary of  
Coastal States  
Energy Company

February 6, 1985

Mr. Wayne Hedburg  
Permit Supv./Reclamation Hydrologist  
DIVISION OF OIL, GAS & MINING  
355 West North Temple  
3 Triad Center, Suite 350  
Salt Lake City, Utah 84180-1203

Re: Proposed Plan for M&RP Modification for  
Permanent Open Coal Storage at Skyline Mine

Dear Wayne:

Here is our response to the technical deficiencies for the proposed M&RP permit modification for permanent open coal storage.

UMC 784.23 Operation Plan: Maps and Plans

(b) (4) Each application shall contain maps, plans and cross-sections of each coal storage area.

Attached is a revised map 3-6a which shows the typical cross sections of the proposed open coal storage areas.

UMC 784.11 Operation Plan: General Requirements

(b) Please describe how the coal storage area is designed so as to eliminate fire hazards and maintained so as to eliminate fire hazards from spontaneous combustion and other ignition.

(b)(4) Each application shall contain a narrative explaining the construction, modification, use, maintenance and removal of the coal storage area.

~~The two coal storage areas will have a drainage ditch constructed around the perimeter as shown on Map 3-6a. Coal will be placed on the prepared base and the pile built up to an approximate height of 35 feet. As the pile is built up it will be wheel rolled to compact the coal thus eliminating air from the stored material and eliminating the possibility of spontaneous combustion.~~

The storage areas will be posted as restricted areas and prohibit open flame on or near the piles so as to eliminate the possibilities of other

ignitions. Coal will be loaded out of the piles to meet surge shipment demands. The drainage ditch around the piles will be maintained and kept open except during the winter months when they will be snowed over. Final removal of the open coal storage areas will be accomplished by first removing and shipping all of the coal. The area will be reclaimed as outlined in the Skyline approved M&RP.

UMC 784.24 Transportation Facilities

The plan should contain a description of each road to be constructed, used or maintained for this open coal storage area. The description must include a map, appropriate cross-section and specifications for the road.

All of the roads used in conjunction with the open coal storage are already in existence and are shown in the approved Skyline M&RP. The haul route showing the roads to be used are shown on Map 3-6a.

If you need any additional information, please contact us. We would appreciate your early review of this information as the need for this open coal storage is becoming paramount.

Sincerely,



*For* Glen A. Zumwalt  
Vice President and General Manager

KZ:GAZ:ss

Glen A. Zumwalt  
Vice President and  
General Manager

EXHIBIT 4



**Utah Fuel  
Company**

P.O. Box 719  
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(801) 566-7111

Subsidiary of  
Coastal States  
Energy Company

February 8, 1985

Mr. Wayne Hedberg  
Permit Supv./Reclamation Hydrologist  
DIVISION OF OIL, GAS & MINING  
355 West North Temple  
3 Triad Center, Suite 350  
Salt Lake City, Utah 84180-1203

Re: Temporary Open Coal Storage

Dear Wayne:

Here is our response to the technical deficiencies for the proposed temporary open coal storage.

UMC 784.11 Operation Plan: General Requirements

(b) Please describe how the coal storage area is designed so as to eliminate fire hazards and maintained so as to eliminate fire hazards from spontaneous combustion and other ignition.

(b)(4) Each application shall contain a narrative explaining the maintenance of the coal storage area.

~~The coal storage area will have a drainage ditch constructed around the parameter and a culvert placed under the pile as shown on Map 3-6b. Coal will be placed on the prepared base and the pile built up to an approximate height of 45 feet. As the pile is built up it will be wheel rolled to compact the coal thus eliminating air from the stored material and eliminating the possibility of spontaneous combustion.~~

The storage area will be posted as a restricted area and prohibit open flame on or near the pile so as to eliminate the possibility of other ignitions. Coal will be loaded out of the pile to meet surge shipment demands. The drainage ditch around the piles will be maintained and kept open except during the winter months when they will be snowed over. Final removal of the open coal storage areas will be accomplished by first removing and shipping all of the coal. The area will be reclaimed as outlined in the Skyline approved M&RP.

Mr. Wayne Hedburg  
February 8, 1985  
Page Two

UMC 784.13 Reclamation Plan: General Requirements

The applicant must define the phrase "when this coal storage is moved, the slope will have as much coal removed as practical". What is practical, 1 inch, 1 foot, 10 feet, etc.? It is very unclear as currently written.

The intent for coal removal from the road fill slope is that we will remove the coal to a point that the slope has the appearance of an earthen fill not a coal fill. There may be some scattered coal still on the surface but basically the coal would of been removed without removing any significant amount of soil that comprises the road fill.

UMC 784.24 Transportation Facilities

The plan should contain a description of each road to be constructed, used or maintained for this open coal storage area. The description must include a map, appropriate cross-section and specifications for the road.

All of the roads used in conjunction with the temporary open coal storage are already in existance and are shown in the approved Skyline M&RP. The haul route showing the roads to be used are shown on the attached map.

If you need any additional information, please contact us. We would appreciate your early review of this information as the need for this open coal storage is becoming paramont.

Sincerely,



For Glen A. Zumwalt  
Vice President and General Manager

KZ:GAZ:ss

Attachments

