STATE OF UTAH
NATURAL RESOURCES
Oil, Gas & Mining

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October 18, 1985

CERTIFIED RETURN RECEIPT REQUESTED
(P402 457 246)

Mr. Keith W. Zobell
Environmental Engineer
Utah Fuel Company
P. O. Box 719
Helper, Utah 84526

Dear Mr. Zobell:

RE: Operator Response to Conditional Approval for Removal and Disposal of Sediment from Sedimentation Pond, Skyline Mine, ACT/007/005, #3 and #4, Carbon County, Utah

The Division has received (September 30, 1985) Utah Fuel Company's letter dated September 24, 1985 which addresses the remaining conditions as attached to our September 16, 1985 letter which outlined remaining deficiencies or concerns with the operator's previous, September 6, 1985, response to our conditional approval letter for this proposed plan as referenced above. Utah Fuel Company has adequately addressed most of the conditions attached to the August 19, 1985 conditional approval letter. However, the following information is provided to clarify the questions raised in your September 24 letter. Additional information is still required to address Conditions #2 and #4 as indicated below.

Condition #2

The operator has provided sizing calculations and did not design dimensions for the drainage ditch which has been constructed onsite. The calculations indicate that an effective cross-sectional area of 14.4 square inches is necessary to handle the design peak flow of 9.1 gallons per minute (gpm) and at a velocity of two feet per second (fps). The operator states that the as-built cross-sectional area of this ditch is larger than necessary to handle this design peak flow. The Division has checked the operator's calculations and wishes clarification on the following issues concerning the derivations.

If appropriate, Utah Fuel may reference and identify specific sections of the approved Mining and Reclamation Plan (MRP) which address the informational requirements requested below.

1. Utah Fuel must submit a map illustrating the drainage area for the diversion along the BC-12 conveyor. The map must depict drainage controls that delineate the drainage area (topographic or structural controls).

2. Please cite the source of the precipitation value used in the computations.

3. The method used to calculate the peak flow event is incorrect. The distribution of rainfall and the resultant hydrograph is not an even distribution, the SCS type II distribution must be used for all peak flow calculations. The curve number proposed is acceptable (90).

4. All assumptions must be included and justification for all inputs to the calculation of the peak flow. All appropriate values must be referenced to the map requested above. These values include hydraulic length, average watershed slope, precipitation depth, time of concentration and the peak flow value.

5. Velocity calculations must be submitted for the peak flow event in the proposed channel. This calculation must be supported by the Manning's n-value used, the slope of the diversion, and the diversion configuration. Cross sections for each reach of the diversion that varies in configuration must be submitted. Maximum slope values must be used for the calculation of the expected velocity and minimum slope values for the the calculation of channel capacity.

6. Diversion stability must be addressed. Justification that the existing material will be stable at the design velocity or designs for adequate riprap placement must be presented.

7. A map must be submitted depicting the location of the proposed diversion.

Condition #4

Utah Fuel has requested an extension of time from October 1 until October 10 to provide the Division with the aerial survey map for the sedimentation pond in question. On October 1, Mr. Keith Zobell spoke with Wayne Hedberg and stated that the operator would need an additional five days until the 15th of October to provide the survey map. The Division has not received the finalized draft of the survey map for the sedimentation pond as of this dated letter. This constitutes the fourth extension request for this specific document. It is the Division's opinion that the operator has had sufficient time to obtain and submit the required map.

Condition #5

The Division's September 16 letter indicated that the Division had not received a formal written approval from the U. S. Forest Service (USFS) for this proposal. The letter indicated that the Division would require a copy of the USFS written approval prior to the finalization of this condition. The following paragraph of that letter infers that U. S. Fuel must provide a copy of said written approval. The Division is responsible for obtaining the USFS permit approval in this case and it was not the intent of the September 16 letter to state that this practice had changed. The Division has since received a copy of the written sign-off from the USFS for this project. The Division appreciates your cooperation in resolving the remaining conditions of this permitting activity. Please call should questions remain concerning the content of this final approval letter.

Sincerely,

D. Wayne Hedberg

for Lowell P. Braxton
Administrator
Mineral Resource Development
and Reclamation Program

DWH/btb
cc: Allen Klein
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