



Utah Fuel Company
A SUBSIDIARY OF THE COASTAL CORPORATION

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DIVISION OF
OIL, GAS & MINING

November 19, 1990

The Energy People

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

Dear Mr. Braxton:

In our submittal for the coal stacking tube amendment we proposed to protect the existing cut slopes on either side of the pile by: (1) placing a drain blanket of well graded material on the slope on an as-needed basis, and (2) armouring the slopes with reinforced shotcrete to help stabilize the slopes and to protect them from being dug into by machinery moving the coal. We have been re-evaluating this proposal and feel that it will not accomplish the desired objectives. The desired objective for both the land management agencies and Utah Fuel Company are the same -- not to allow machinery to dig into the existing cut slopes, thus creating an unstable slope condition and introducing contaminants into the coal product.

We have had several shotcrete contractors visit the site and make proposals for shotcreting these slopes. All of them are willing to shotcrete the slopes; however, all of them also expressed concerns about the success of the job. Due to the steepness and roughness of the slopes they have serious doubts as to the longevity of the shotcrete, even without heavy machinery working in close proximity to it. They also feel there is a good chance of failure of the shotcrete due to frost heaving, which is due to the natural subsurface water that will occur underneath the shotcrete.

After further review we feel that shotcreting the slopes will not help us achieve the desired objective. A layer of shotcrete is not much of a barrier for a D8 or D9 size of a tractor. This size of machinery could rip out a large piece of shotcrete and not even know it until the operator observes the shotcrete, rocks and dirt in the coal. We feel a better alternative is not to have the equipment come in contact with the slope to begin with. In this scenario the shotcrete becomes redundant.

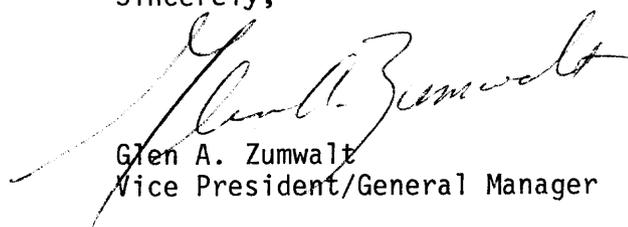
We have been stacking and recovering coal off of these slopes since February 1985. During this time frame we have successfully removed the coal from these slopes without digging into them.

We would like to propose that we continue to protect these slopes through our operational procedures. We would accomplish this by: (1) Leaving a physical barrier of a minimum of 18"-24" of coal on the slopes while the machinery is removing the coal. After the machinery has removed the bulk of the coal, the coal left on the slopes will naturally slough off, leaving a thinner layer of coal. This process will not disturb the existing slopes; (2) We would allow only selected trained operators to operate machinery on the coal pile; (3) These selected operators would be trained in the importance to both you and us of protecting these slopes in the areas of safety procedures, machine operation, and environmental concerns; and (4) We would monitor these slopes to insure that they are being protected.

Approximately 100,000 tons of coal in the proposed stockpile is live storage. As shown on the attached drawing the line storage area is not in close proximity to the existing cut slopes. The only time machinery would be removing coal near the slopes would be the few times each year when we remove the entire stockpile to meet shipping commitments.

We are now and will continue to be committed to adequately protecting the slopes. If you concur with this proposal we will submit the necessary wording changes for the permit. If you need additional information contact Keith Zobell. We would appreciate your early review as we plan on putting the stacking tube into operation in January 1991.

Sincerely,



Glen A. Zumwalt
Vice President/General Manager

GAZ:KZ:lm

Attachments

xc: Ira Hatch, USFS