



**Coastal**  
The Energy People

0040

July 18, 1991

Daron Haddock  
Permit Supervisor  
Division of Oil, Gas & Mining  
355 West North Temple  
3 Triad Center, Suite 350  
Salt Lake City, UT 84180-1203

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JUL 22 1991

DIVISION OF  
OIL GAS & MINING

Dear Mr. Haddock:

Attached are pages 3-19 and map 3.2.1-3 , which shows a proposed permit amendment to bring our coal loadout sedimentation pond into compliance with R614-301-743.300. We have also enclosed three pages of certified engineering calculations which show the design calculation for this emergency spillway.

We recognize that these same regulations also apply to our minesite sedimentation pond. However, we are requesting a variance from these regulations for our minesite sedimentation pond. We are basing this request on the following reasons:

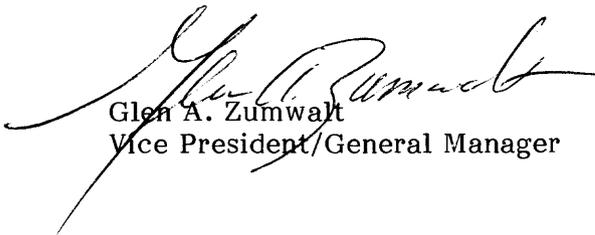
1. The present single pipe spillway is over-designed. It is designed to handle the 24 hour-100 year storm event rather than the required 25 year-6 hour precipitation event.
2. This sediment pond is not tributary to any debris producing streams or areas; therefore, the pond does not become subject to debris that might plug the overflow inlet. The current spillway has a trash rack on it.
3. This is an incised pond. The down slope area from the pond is traversed by a Utah State Highway. This also precluded the construction of an open channel emergency spillway.
4. Since the State Highway and the fact that the pond is incised both preclude an open channel, it would be redundant to build a second emergency pipe spillway. The existing pipe spillway is more than adequate.
5. The existing single pipe spillway was designed and certified by a professional Engineer and approved in our original M&RP by OSM. It has proved adequate and has not created any problem since its installation even during the heavy precipitation and flood years of 1983-84.

DOGM Letter  
Page two

6. Our engineering staff has surveyed the spillway situation and has not been able to determine any feasible method of installing an emergency spillway.

We would appreciate your review of this proposed permit amendment and request for a permit variance. If you need any additional information please contact Keith Zobell.

Sincerely,



Glen A. Zumwalt  
Vice President/General Manager

GAZ:KZ:lm

Attachments