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007/005 #2
cc: DRH
Wayne W.
Paul B
Sharon F.

Coastal
The Energy People

March 9, 1994

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

Re: Loadout Expansion Deficiencies

Dear Mr. Haddock,

Following is our response to your March 1, 1994 Loadout Expansion Deficiency letter.

Deficiency:

1. *The operator will provide the Division with information on the effect flooding could have on the pad extension. The information will include, but not be limited to, how flooding could erode the pad's slope and the resulting slope instability (See R645-301-521.180 and R645-301-521.190).*

Response: The loadout expansion area is built on a wetland area. During the high flood years of 1983-84 and again in 1984-85 the high springtime run off exceeded the 100 year event. During this time frame the expansion area was not flooded. Therefore, we have not and feel we do not need to plan for a disaster flood event over and above the 100 year run off event.

Deficiencies:

2. *The operator must give a detailed description of the construction techniques that will be used to enlarge the sediment pond. The discussion will include but not be limited to how the French drain will be protected, details and designs for the clay liner, embankment elevation width and slope details, and contour and cross section details of the pond and its relationship to the stream channel;*

   and

Utah Fuel Company
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3. *The operator will describe how and where the material from the sediment pond expansion will be stored and handled.*

Response: The sediment pond was enlarged using a trackhoe. The area for the pond expansion was an already disturbed area and therefore had no topsoil and since the excavated material met the criteria for the loadout expansion pad it was picked up with a front end loader and used as backfill in the loadout expansion pad. The topsoil from the pad expansion was salvaged and put into the RRLO topsoil storage pile. The French drain was not in the construction zone and was therefore not affected. There is no design for a clay liner as one was not used. The embankment elevation width, slope details and contours and cross section details are shown on map 3.2.1-4 which was submitted in our December 16, 1993 submittal.

Deficiency:

4. *The operator will supply the division with a detailed cost estimate for reclamation cost of the loadout expansion as required under R645-301-830-140.*

Response: Reclamation bonding costs will change as follows:

Excavate 2240 Yd^3	*$1,682.00 **

** This figure is based on cost estimates as outlined in our approved M&RP and have been inflated to 1996 dollars. We increased our bond when the M&RP was renewed to include a contingency fund to cover changes in the permit. This contingency is adequate to cover these additional costs.*

Deficiency:

5. *The operator must provide details which describe the measures taken to prevent coal spills from occurring as a result of coal handling on the coal storage area. A distinctive physical barrier must be provided to readily identify the extent to which coal can be stockpiled and to help prevent coal spillage on the outslopes of the pad area into the buffer zone.*

Response: We feel our response No. 5 in our December 16, 1993 submittal already responds to this question, as a MSHA berm is a distinctive physical barrier.

As indicated in earlier correspondence, we are redoing Map 3.2.1-3. We have recently received a draft copy of the new base map and in the next few weeks will be correcting it and developing the final map.

Sincerely,

Ken Payne
Vice President/General Manager
Utah Fuel Company

KP:KZ:dk

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