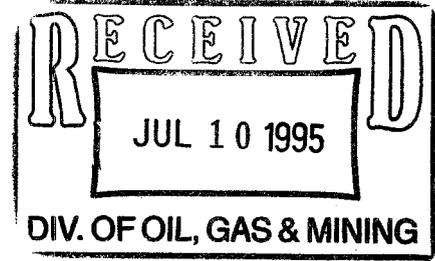




Coastal
The Energy People



July 7, 1995

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

Copy Daron: Pam

Re: Deficient ASCA/Exempt Area Amendment, Utah Fuel Company, Skyline Mine, ACT/007/005-94H, Folder #3, Carbon County, Utah

Dear Mr. Haddock:

We have received your letter of July 3 in response to our submittal dated June 21. You state that the curve numbers we used are for undisturbed areas and are therefore unacceptable. Since no justification or references are provided in your letter as the basis for this statement we are unsure how to respond because we believe the curve numbers used are for disturbed areas. If you could please provide a reference or documentation for this statement it would be helpful to us in developing a response.

The procedure we used to develop curve numbers is as follows:

- 1) The SCS Soil Survey of Carbon Area, Utah was used to determine the types of soils, and percentage and hydrologic soil group of each soil, in the area of interest.
- 2) The cover types and hydrologic conditions of each area were then determined by observation.
- 3) These data were input into SedCad+ 3 and an appropriate curve number was selected for each soil type. A percent weighted curve number for each area was then calculated. SedCad uses the curve number selection criteria as presented in SCS Technical Release No. 55, Urban Hydrology for Small Watersheds. Referring to Tables 2-2a and 2-2c of this document shows that the curve numbers we used are for "Open space (lawns, parks, golf courses, cemeteries, etc)" or equivalently, "Pasture, grassland, or range-continuous forage for grazing."

These curve numbers obviously apply to disturbed areas.

Utah Fuel Company

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Mr. Daron R. Haddock

July 6, 1995

Page 2 of 2

Also if you could provide us with information regarding the standard method of determining curve numbers which you would find acceptable it would save both the Division and the Operators considerable time. How do the curve numbers derived using the Division's acceptable method compare to the curve numbers we used?

We appreciate your assistance in this matter and look forward to receiving this information so that we may resubmit acceptable demonstrations as quickly as possible.

Very truly yours,

A handwritten signature in black ink, appearing to read "Ken Payne", with a long horizontal flourish extending to the right.

Ken Payne
General Manager