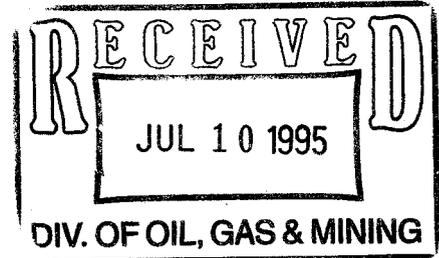




**Coastal**  
The Energy People

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

Re: Mid-Term Review Response, Coastal States Energy Company, Skyline Mine,  
ACT/007/005, Folder #3, Carbon County, Utah

Dear Mr. Haddock:

The following is in response to your letter of June 26 in reference to the above. In our response of June 1 we stated that Eccles Creek is protected from mining activities within the buffer zone by runoff control measures which have been installed at the Skyline Mine operation. We stated that most of the runoff is treated in sedimentation ponds, the discharges of which are regulated by UPDES Permit No. UT0023540. It was also stated that areas not reporting to a sedimentation pond are classified as either Alternate Sediment Control Areas or as exempt areas. The currently approved Skyline permit contains cross-references from the regulations to applicable sections or pages of the permit. Page 16 of the cross-reference section of the permit was revised and submitted with the June 1 letter to include a cross-reference from R645-301-731.611 to Volume 2, page 3.64 of the permit which contains descriptions of the runoff control measures discussed above. This portion of our response was not addressed in your letter of June 26. However, in a phone conversation the morning of July 7, between Steve Johnson, of your staff, and Barry Barnum, of Utah Fuel Company, Mr. Johnson indicated that a reference in the permit from R645-301-731.611 to a description of the measures used to protect the stream from activities within the buffer zone is essentially what he is requiring in the mid-term review. It appears that the information required by Mr. Johnson was submitted to you in our response dated June 1.

As further assurance to the Division that activities taking place within the buffer zone of Eccles Creek are not degrading the quality of the stream we performed a simple analysis on data resulting from monitoring of Eccles Creek through 1994. This analysis was performed on total dissolved solids (TDS) because this parameter is a general indicator of overall water quality. Sampling stations CS-3, CS-9, and CS-11 are located on three forks of Eccles Creek above the mine operation. Station CS-2 is located downstream of the mine at the Forest Service boundary. Stations CS-12 and CS-14 are the discharges from mines No.3 and No.1 respectively. Flows from stations CS-3, CS-9, CS-11, CS-12, and CS-14 combine to form most of the flow at station CS-2. Flow and TDS averages for each of the above mentioned sampling sites for the period 1981 through 1994 are shown in the table below. Also shown is the calculated estimate of the

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average flow and flow-weighted average TDS of the combined flows from stations CS-3, CS-9, CS-11, CS-12, and CS-14. The calculated averages will be compared to the averages measured at station CS-2.

STATION	AVERAGE FLOW (cfs)	AVERAGE TDS (mg/l)
CS-3	0.7	257
CS-9	0.4	245
CS-11	0.3	305
CS-12	0.5	658
CS-14	0.4	1024
Total	2.3	
Flow Weighted Average		482

The actual measured flow at station CS-2 is 2.4 cfs and the average TDS is 446 mg/l. Comparing these values to those calculated in the table above shows that an additional flow of approximately 0.1 cfs is going into the stream. This flow can be accounted for by runoff from the mine site including the buffer zones, and runoff from the road and stream banks between the mine site and the Forest Service boundary. Comparison also suggests that this additional flow has a very low TDS and contributes insignificantly to downstream TDS concentrations. While this analysis is very general, it is so robust that we are confident that more detailed analyses will yield essentially the same results. We believe that the measures employed at the mine to protect the stream from activities within the buffer zone are effective. Increased TDS observed in the Eccles Creek downstream from the mine site are the direct result of discharge from the underground workings of the mines. This discharge is regulated by our UPDES permit which currently allows a TDS concentration of 1446 mg/l.

If there are any questions, please contact Barry Barnum at 636-2669.

Very truly yours,



Ken Payne  
General Manager