

0062

PLATEAU MINING COMPANY

A Subsidiary of Getty Oil Company
P.O. Drawer PMC Price, Utah 84501
Telephone (801) 637-2875

✓ CC ~~file~~ file
orig not file
cc. Prange

RECEIVED

May 15, 1984

MAY 17 1984

DIVISION OF OIL
GAS & MINING

Ms. MaryAnn Wright
Division of Oil, Gas and Mining
4241 State Office Building
Salt Lake City, Utah 84114

Act/007/006
#8

RES NOV 84-47-6

Dear Ms. Wright:

As is our right according to UMC 845.17(a), we would like to submit the following information for consideration during the assessment of these violations. This information is submitted within the 15 working day limit as called for.

Nov 1 of 6 - Ditch Number 16 flows to sediment trap Number 9, which drains into sediment pond Number 6. The probability of occurrence would be insignificant considering the time of year. Thunderstorms, which would be the only event that would cause a problem, do not occur in this area until June of the year.

The extent of potential damage since none actually occurred, would have remained within the permit area and would have been controlled by the sediment trap and sediment pond.

Ordinary negligence should be assessed in this case, since there was a culvert in the ditch. The problem was that the large coal haul trucks had spilled coal in the ditch which covered the culvert inlet and outlet.

Nov 3 of 6 - This violation is a difficult one for us to accept. The straw filter was covered by a snowbank the week before the inspection. The filter was not visible and I had not made an in-house inspection the week of the inspection. The question from our standpoint is; how much flexibility is there in the regulations to allow for the springtime situation that we face?

Obviously, all spring maintenance work cannot be identified and resolved in a few days or even a few weeks.

Ms. MaryAnn Wright
May 15, 1984

Page Two

We would appreciate some consideration in this regard on this violation as well as others.

Nov 5 of 6 - This area drains into sediment pond Number 3, and thus the seriousness and extent of damage were minimal. The area where erosion occurred is very rocky and little actual erosion occurred.

We would appreciate your consideration in these matters.

Respectfully,



Ben Grimes
Environmental Coordinator

lc