

Sunnyside Coal Company

Operations • Highway 123 • P.O. Box 99 • Sunnyside, Utah 84539

October 11, 1991

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DIVISION OF
OIL GAS & MINING

Mr. Mike Herkimer
Utah Department of Health
Bureau of Water Pollution Control
P. O. Box 16690
Salt Lake City, Utah 84116-0690

Dear Mr. Herkimer:

Re: Whitmore Mine Water Ponds (UPDES 002A And 002B)

As a result of our discussions during the meeting of October 10, 1991, at Sunnyside Mine concerning the discharges of UPDES 002A and 002B, Sunnyside Coal Company plans the following courses of action:

1. Place 002A and 002B Ponds in series via connecting eight-inch diameter pipe to increase retention time. 002B will be the discharge point. The connective pipe will be lengthened to the far end of 002B to avoid short-circuiting problems. This will be done within two weeks.
2. The discharge of the pumps from the bottom of the mine will be changed from the existing location adjacent to the suction of the Main Mine Dewatering Pump, which discharges to the Whitmore Ponds, to the top of the Main Sump at 15th Right. This will allow greater retention time in this sump and also avoid the disturbance of the discharging waters at the suction of the Main Mine Dewatering Pump. This can and will be done within the next two weeks.
3. Sunnyside Mine has budgeted a submersible deep-well pump from the surface at Asphalt Canyon (Water Canyon) to the bottom of the Manshaft Dips at 23rd Left to dewater the back end of the longwall panels. This should reduce the volume of water going to the Whitmore Ponds allowing more retention time. The timing for the completion of this project is late summer 1992 but is dependent upon the mining rate. Permit change approval from DOGM is necessary prior to starting construction, and a variance from MSHA must be granted also.

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Mr. Mike Herkimer
Page 2
October 11, 1991

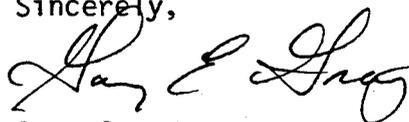
4. An unused air shaft (Pole Canyon) discharges more than 100 gpm of excellent quality water into the 15th Right Sump which is pumped to the Whitmore Ponds. This water may prove to be of culinary water quality and could be used by the city of Sunnyside. Because Sunnyside Coal Company has no future plans for the air shaft, we are developing a plan to plug the bottom of the shaft to stop the water flow and use the water in other ways. By stopping this water inflow, the volume of water to the Whitmore Ponds will also be reduced, allowing a greater retention time. This plan should also be implemented by mid-summer of next year with the exact timing depending upon regulatory approvals and an agreement with the city of Sunnyside.

Items 1. and 2. will be done regardless of the future; however, Items 3. and 4. do have contingencies which could change these plans. Sunnyside Coal Company will notify, in writing, the Utah Bureau of Water Pollution Control of any changes which would significantly change these plans.

We will also investigate and select a suitable flocculant to use for emergency application.

Sunnyside Coal Company is committed to maintaining clean discharges from its Whitmore Ponds into Grassy Trail Creek. We really appreciate the meeting, its cordial exchange of ideas, and the common agreement of a plan of course of action to guarantee this commitment.

Sincerely,



Gary Gray
Chief Engineer

GG:th

cc: Miles Moretti, DWR, Price
David Ariotti, DEH, Price
Pam Grubaugh Littig, DOGM, SLC
Joe Fielder, Sunnyside Coal
Tom Jarmillo, Sunnyside Coal