



# State of Utah

DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF OIL, GAS AND MINING

Michael O. Leavitt  
Governor  
Ted Stewart  
Executive Director  
Lowell P. Braxton  
Division Director

1594 West North Temple, Suite 1210  
PO Box 145801  
Salt Lake City, Utah 84114-5801  
801-538-5340  
801-359-3940 (Fax)  
801-538-7223 (TDD)

April 15, 1998

Steve Traweek, Resident Agent  
EARTHCO  
1179 E. Main St. #104  
Price, Utah 84501

Re: Addendum #6, NOV abatement for N98-41-02-01, Nevada Electric Investment Company, Wellington Preparation Plant, ACT/007/012-98C, Folder #3, Carbon County, Utah

Dear Mr. Traweek;

The Division has reviewed your April 8, 1998 submittal. The technical analysis identifying several minor deficiencies is provided for your review.

#### TECHNICAL ANALYSIS:

#### HYDROLOGIC INFORMATION

Regulatory Reference: R645-301-700.

The proposed amendment includes drawing T1-9597. A supplement to Watershed 7 and text changes for drainage at the Covol Wash Plant.

Changes were included on page 1b that reduce the number of sedimentation ponds at the site. **These were not identified as highlighted changes in the application.** If the permittee wishes to remove the other two ponds at the site, or change their title from sedimentation pond to an Alternate Sediment Control Measure, then this change should be included in the permit application form under a separate amendment.

The drainage from CVL-D5 needs to be redirected toward the refuse or, the sediment control measures for the area south east of the county road needs to include this drainage. The drainage from CVL-5 and the flotation pad area appears to drain to the existing county culvert under the road. This potential flow direction was verified in a discussion with Paul Baker. He indicated that evidence that some water has traveled from the pad area to the existing county culvert during inspections. The designs for drainage CVL-D3 needs to extend the full length down the waste pile to the slurry pond. The map needs to be certified.

**Findings:**

This amendment does not meet the minimum requirements of the regulations. The permittee must provide the following in accordance with the requirements of the regulations:

**R645-301-120.** Provide a clear and concise permit filed in the format required by the Division that meet the R645 regulations including:

- The drainage from CVL-D5 needs to be redirected toward the refuse or, the sediment control measures for the area south east of the county road needs to include this drainage.
- The designs for drainage CVL-D3 needs to extend the full length down the waste pile to the slurry pond.
- The map needs to be certified.

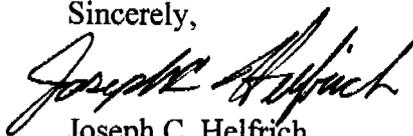
**Recommendations:**

It is recommended that page 3a (well slug tests) and 1a (sediment pond changes) be separated from this amendment. Additional information including the data from the slug test and the analyses from the Aqtesolv model needs to be submitted with that amendment to meet the requirements of R645-301-130.

Please respond to these deficiencies by April 30, 1998. As this amendment is the subject of Notice of Violation (N98-41-02-01) you may need to request an extension to the abatement requirements.

If you have any questions please call.

Sincerely,



Joseph C. Helfrich  
Permit Supervisor

tat  
cc: Paul Baker  
O:\007012.WEL\FINAL\DEFMT98C.LET