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VIA: Email

June 6, 2014

Daron Haddock, Environmental Manager  
Utah Coal Regulatory Program  
STATE OF UTAH  
Division of Oil, Gas & Mining  
1594 West North Temple, Suite 1210  
Salt Lake City, Utah 84114-5801

RE: Wellington Prep Plant (C/007/0012): Dryer Pile Moved: An Update

Dear Mr. Haddock:

In my letter to you dated April 7, 2014, I explained there was the potential that some of the material that had been previously excavated to enlarge the Dryer Pond at the Wellington Prep Plant may be moved to create space for heavy equipment to access Price River Terminal's approved railroad track expansion. There was also a chance that a portion of the pile may be used as fill for the expansion. This request was approved by the Division and a letter requesting as-built information, once the project completed, was sent on May 7, 2014. Listed below are the items requested in the letter followed by our responses to them.

### Division Requests

- 1) In the May 7, 2014 letter, the Division requested *"an as-built statement of the volume remaining in the pile and a commitment to test the remaining material"*.
- 2) Additionally, the Division stated that *"we also recognize that a portion of the pile may be used as fill but that alternative borrow material needs to be identified to replace what has been used"*.
- 3) The Division also stated that *"depending on the amount of movement, you may also need to revise your map to reflect the accurate location of the remaining pile"*.

### PRT Responses

- 1) As stated in my April 7, 2014 letter to the Division, based on MRP cross-sections (see Dwg. 712F), Dan Guy, P.E., estimated the volume of the pile to be between 3,500 - 4,000 cubic yards. The operation to move the pile was overseen by the terminal manager, Mark Rice. Mr. Rice has experience estimating volumes for trucks and railcars. He estimated that about 1,500 cubic yards of the pile was removed to accommodate heavy equipment, and a portion of that will end up as fill for the track expansion project. Therefore, the amount that remains in the pile is approximately 2,000 - 2,500 cubic yards.

As requested above, PRT will sample the remaining material and have it analyzed in a commercial laboratory. Standard turnaround time for the lab is 3 weeks, but depending on their workload, it can take up to 3 months. When the lab results are complete, they will be provided to the Division.

- 2) At the time of final reclamation, the material can easily be replaced from Borrow Area C (see MRP Dwg. G9-3511). As an alternative, during the current onsite activities outside the "Disturbed Areas" (see MRP Dwg. E9-3333), if the opportunity arises to salvage material from Borrow Area B, this will be accomplished following approval by the Division.
- 3) Relating to the map change mentioned above, because most of the pile material remains in the same location shown on MRP Dwg. 712E, a change is not necessary.

Thank you for working with us on the project. Please do not hesitate to contact me if you have questions or comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Patrick D. Collins".

Patrick D. Collins, Ph.D.  
Resident Agent

cc: T. Stanley (PRT)