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November 6, 1980

Mr. Douglas F. Day, Director
Division of Wildlife Resources
1596 West North Temple
Salt Lake City, Utah 84116

Attn: Southeastern Regional Office

RE: Blazon Mining Company
Blazon #1 Mine
ACT/007/021
Carbon County, Utah

Dear Mr. Day:

As was requested by your people on October 15, 1980, I have had the hydrologist, engineering geologist, and biologist of my staff look at the development and planned operational activities at the Blazon #1 Coal Mine.

Perhaps a brief history will explain the government regulations and the interactions within the government for environmental protection, of which we believe Mr. Joe Harvey, of Blazon, has a very good understanding.

In May, 1979, Mr. Harvey received a suggestion from the Division of Wildlife Resources, that the 600 feet of stream which might be impacted by the mining operations be culverted. The mining plan was submitted incorporating this suggestion. According to the coal regulations for culverting, a 100-year precipitation event for this canyon was initially used in the calculations. In October, 1979, this Division notified Mr. Harvey that design calculations would require that a 108" diameter culvert be utilized.

It became apparent that requiring the implementation of a 600-foot length of 9 foot diameter culvert within this canyon would impose excessive economic burdens upon the operator, in addition to the severe surficial alteration which would assuredly result to the canyon. Upon reworking the calculations with a 50 year precipitation event the culvert size could only be reduced to 84 inches in diameter. In order to insure against total failure of the mine pad resulting

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from a storm event, new plans were submitted in March of 1980 which provided for less disturbance overall. This new plan called for limiting the mine pad to 1.5 acres on one side of the canyon, minor stream realignments and two 50 foot lengths of 84 inch culvert for stream crossings. This modification thus provided a much more environmentally acceptable scheme.

This Division shares your concern for environmental degradation since essentially we are charged with enforcement of many and varied environmental regulations.

Perhaps pertinent members of your Division would be interested in copies of these regulations. If so, we can provide them. In terms of water pollution control, it might be helpful to abbreviate them for you.

Essentially, there are three main ways that the Division ensures the minimization of environmental degradation to water systems.

1. Each coal mine plan must contain a detailed and professionally engineered drainage control plan. This includes a system of berms, ditches, culverts and sediment ponds. Although not mandatory under the Utah Coal Mining and Reclamation Act, the Division will be requesting that all coal operations include as part of, or as an addendum to, their mine plan, an acceptable snow removal plan that would limit the probability of additional contaminants entering the hydrologic system.

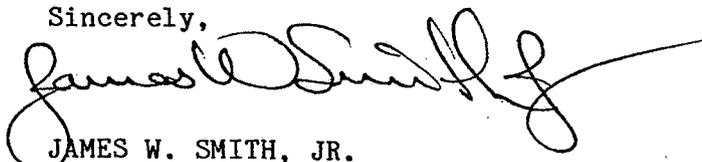
2. Each coal mine is required to implement a water monitoring program for both surface and groundwater systems assessing both flow and a variety of parameters on quality and chemistry. The surface monitoring points include stations both upstream and downstream from the mine site to document any additional effluent contributions resulting from the mining operations.

3. The Division makes full inspections quarterly and partial inspections monthly for each coal mine. This process assures that plans are implemented accordingly and that regulations are being met.

In answer, we acknowledge that your past experience may not have shown such a mine plan as Blazon's satisfactory. However, present knowledge that the Blazon Mine has met and exceeded all design criteria and other requirements of the regulations, should allay your fears of stream degradation at this site.

Again, we appreciate your input and concern.

Sincerely,



JAMES W. SMITH, JR.
COORDINATOR OF MINED LAND DEVELOPMENT