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April 2, 1981

#0367129

REGISTERED RETURN RECEIPT REQUESTED

Mr. Dan Guy, Chief Engineer  
Beaver Creek Coal Company  
1109 South Carbon Avenue  
P. O. Box AU  
Price, Utah 84501

ACT/007/016  
ACT/007/017  
ACT/015/004  
ACT/007/022 ✓

RE: Gordon Creek Nos. 2 & 3  
Huntington #4, C.V. Spur  
Work Required to Upgrade  
Surface Conditions to  
Permanent Performance  
Standards

Dear Dan:

During surface inspections during the last week of February and the first week of March, several potential on-site surface compliance problems were discussed. This letter is intended to outline those points that were discussed and hopefully to facilitate compliance work prior to the next monthly inspection.

With regard to the extension of the 24-in culvert out of the northwest natural drainage, I have brought the materials you provided me last Friday to Wayne Hedberg's attention and assisted him in preparing a letter of approval which should be forthcoming. This will allow you to perform the needed work.

Following is a list of areas of concern at the Gordon Creek No. 2 Mine:

1. Berm required at the northwest end of upper portal pad near new subsidence area to prevent any drainage from this area from mixing with the natural drainage.
2. Some concern developed regarding sizing of the ditch which currently passes disturbed surface drainage from the parking and bathhouse area to the sedimentation pond. Is this ditch sized to convey all the water from a 10-year, 24-hour precipitation event? In the event of an intense runoff event, you can guarantee that all water

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will be conveyed to the sedimentation pond rather than overflowing the ditch thus discharging untreated runoff and possibly exceeding effluent limitations? Has there been any discussion of employing a culvert in this area?

3. The area near the main portal entry near the substation merits some drainage attention. There is no consistent grade above the portal. Also, the berm is in a state of bad repair.
4. The 18-in culvert which conveys water from the loading area to the sedimentation pond was partially clogged with sediment. This area, I'm confident, will be taken care of by your routine maintenance program.
5. We discussed the possibility of placing buffer zone signs along the diversion (east side of loading area) to prevent encroachment upon this area by loading activities. The diversion in question empties into an intermittent stream in Bryner Canyon then flows to the North Fork of Gordon Creek. It is recommended that Beaver Creek place signs in this area and where the diversion empties into the creek. Beaver Creek would have to supply data to show that this area does not contain a biological community as defined in UMC 817.57 (c) if there was an objection to erecting buffer zone signs.

I was pleased to be informed that the diversion and berm problems above the bathhouse at Gordon Creek No. 3 had been alleviated. As you are aware, there is a little work required to better define the outlet structure at the lower sediment pond.

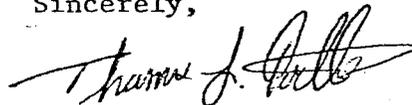
With regard to the violations at Huntington #4 Canyon (81-3-3-3), we will consider March 26, 1981, as the effective abatement date pending a follow-up inspection.

Please be informed that the Division will be inspecting for perimeter markers on the next monthly inspection.

As discussed on March 27, 1981, it would be advisable to submit an addendum to the C.V. Spur plan regarding the proposed office and lab relocation.

If you have any questions, please do not hesitate to call.

Sincerely,



THOMAS L. PORTLE  
RECLAMATION OFFICERS

cc: Tom Ehmett, OSM

TLP/btm