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Beaver Creek Coal Company

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Telephone 801 637-5050

ACT/007/022 - 87D & 87E
#2



December 10, 1987

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Mr. Lowell P. Braxton
Administrator
Utah Division of Oil Gas & Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1230

**DIVISION OF
OIL, GAS & MINING**

RE: Response to Review of Amendments
T.D.N. 1 thru 8
C.V. Spur Loadout Facility
ACT/007/022-87E, #2
Carbon County, Utah

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Dear Mr. Braxton:

Enclosed are 8 copies of revised pages for the PAP, addressing the concerns in Mr. Hedberg's letters of 11/16/87. The revised pages are numbered and dated, and should replace those previously submitted.

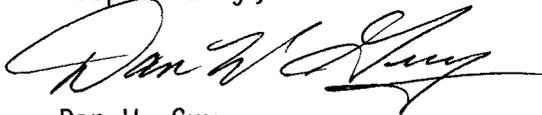
Some of the technical comments are addressed by an explanation rather than a page revision. The following is a summary of my understanding of the present status of the TDN responses, deficiencies, and revisions or explanations to address the deficiencies:

- (1) TDN #1,2,3,& 4 - Response adequate or none required;
- (2) TDN #5- Page 7-90d revised to address concerns in conditional approval;
- (3) TDN #6,7 - No technical concerns received - I assume the previous response was adequate;
- (4) TDN #8 - Required correction of discrepancies in (a),(b)(2), and (c);
 - (a) Culvert numbers were identified in the T.D.N. response, on page 7-88a and Plate 3-2 (10/15/87);
 - (b)(2) The two ten-inch culverts are described on the 3rd page, item (3)(b) of my response letter on T.D.N. #8 (10/21/87); the culverts were un-numbered and appeared on the old map; they have been removed and drainage is as shown on Plate 3-2 (10/15/87);

(c) As discussed with my previous T.D.N. submittal on 10/21/87, culvert C-5 was replaced with a larger (24") culvert some years ago; The culvert design specifications on Table 7-25, p.7-88a (10/15/87) show the velocity to be non-erosive (3.59 fps). Velocities at this culvert outlet are so low that the area acts as a settling basin and requires frequent cleaning; rip-rap was placed at the outlet, however there is no need for a filter blanket and a plan, since the rip-rap is primarily cosmetic and will likely be disturbed on a frequent basis for cleaning. It should be noted that culvert C-5 discussed above was the only culvert in the original plan with proposed rip-rap; this was based on a smaller size culvert and an apparently erroneous velocity calculation which has now been corrected. Rip-rap was placed at all culvert outlets showing evidence of scouring after the inspection; however, the short time frame did not allow for design and submittal of plans on filter blankets, etc. Gravel ranging from $\frac{1}{4}$ "- 1" was mixed in with the rip-rap during placement, and appears to be working adequately. These culverts are maintained on a regular basis. If additional scouring or erosion becomes evident, it will be corrected. If the problem appears to be associated with the lack of a filter blanket, it will be installed at that time.

I hope this submittal and explanation will help clarify remaining questions on the T.D.N. responses. If you have any questions, please let me know.

Respectfully,



Dan W. Guy
Mgr. Permitting/Compliance

cc: J.L. Coffey
R.J. Marshall
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