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ACT/007/033 #2 & #5

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Tower Division

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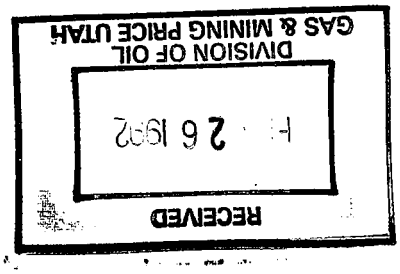
February 26, 1992



State of Utah
Department of Natural Resources
Division of Oil, Gas and Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

Attn.: Mr. Henry Sauer
Senior Reclamation Soils Specialist

Re.: NOV 92-32-1-2 of 2

Dear Mr. Sauer:

Enclosed for your review is Andalex Resources, Inc., response to the remedial action required on the above referenced NOV. First, regarding R645 (614)-300-143, leachate analysis, Andalex has revised the text in ACT 007/033 to reflect its commitment to sample and analyze the coal processing waste and reject coal storage site. Enclosed are three copies each of pages which replace existing text including one page from the Table of Contents. In this text we have specified the methods which will be used to characterize the reject material and would we would appreciate any comments you may have. We will await your approval of this procedure and upon approval, will implement the plan.

Second, regarding the erosion pin monitoring program, the text as well as Plate 2, have been revised to reflect specifically the types of erosion protection which have been implemented at the Wildcat Loadout. Three copies each of replacement text in addition to the plates are enclosed. Although erosion pins had been installed initially in the diversions noted in the plan, it was determined by Andalex that this means of monitoring was ineffective. The nature of the soils at the Wildcat Loadout are such that every storm event resulted in significant erosion in certain locations and erosion pins were simply washed away. Since Andalex had made observations of these various areas where erosion was obviously a problem, erosion protection, primarily in the form of half round culverts, was immediately provided. Other ditches at the loadout showed problems of siltation and erosion pins were immediately destroyed when these ditches were cleaned out. Therefore, they were also ineffective in ditches where siltation rather than erosion was the problem. Because the erosion pins were discontinued, specific results from an erosion pin study are unavailable. Erosion protection and diversion maintenance at the Wildcat Loadout is a very important issue and Andalex feels that

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the diversions have been well maintained. Volumes I and II of the MRP have now been updated to reflect current actual field conditions at the loadout.

As this is a hinderance violation, we consider this submittal to be an amendment to our plan. We request that upon your review, if additional technical support information is required, please advise.

Respectfully submitted,

Michael W. Glasson
Senior Geologist

MWG/as

Enclosures

cc: Pamela Grubaugh/Littig, Permit Supervisor
w/o enclosures