



GARY R. HERBERT
Governor

SPENCER J. COX
Lieutenant Governor

State of Utah

DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER
Executive Director

Division of Oil, Gas and Mining

JOHN R. BAZA
Division Director

August 26, 2014

James A. Hewlett, Resident Agent
Intermountain Power Agency
10653 South River Front Parkway, Suite 120
South Jordan, Utah 84095

Subject: Oil Transloading Construction, Intermountain Power Agency, Wildcat Loadout, C/007/0033, Task ID #4643

Dear Mr. Hewlett:

The Division has reviewed your application at the Wildcat Loadout. The Division has identified deficiencies that must be addressed before final approval can be granted. The deficiencies are listed as an attachment to this letter.

The deficiencies authors are identified so that your staff can communicate directly with that individual should questions arise. The plans as submitted are denied. Please resubmit the entire application.

If you have any questions, please call me at (801) 538-5325.

Sincerely,

Daron R. Haddock
Coal Program Manager

DRH/sqs
Attachment
O:\007033.WCL\WG4643\Deficiencies.docm





GARY R. HERBERT
Governor
GREG BELL
Lieutenant Governor

State of Utah

DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER
Executive Director

Division of Oil, Gas and Mining

JOHN R. BAZA
Division Director

Technical Analysis and Findings

Utah Coal Regulatory Program

PID: C0070033
TaskID: 4643
Mine Name: WILDCAT LOADOUT
Title: OIL TRANSLOADING CONSTRUCTION

Operation Plan

Hydrologic Water Quality Standards

Deficiencies Details:

R645-301-731.222.2 From the UPDES permit submitted with the application, it appears that there have not been outfalls added for the two proposed sediment ponds. The plan states that when the ponds reach 80% of their water storage capacity, water will be pumped into diversion ditches and into Garley Wash. This requires a new outfall for each pond, and the water monitoring plan in the MRP should be updated to include these points.

adaniels

Hydrologic Ponds Impoundments Banks Dams

Deficiencies Details:

R645-301-742.220 Ponds 1 and 2 both have design discrepancies between the description in the Hydrology section of Chapter 9, and page 2 of the Hydrology report in Appendix A. Pond 1 is described as having a depth of 8 feet in one section and 9 feet in another. On page 9-12, sediment pond 2 is described as 60 feet by 60 feet, and 10 feet deep. Page 2 of the Hydrology Report in Appendix A lists the size of the pond as 50 feet by 50 feet with a depth of 4 feet. Also, the submitted map, "AES Drainage Areas 1, 2, & 3" show pond 2 as 50 feet by 50 feet. Correct the above mentioned sections so that the designs of the ponds are clear.

R645-301-742.223 Ponds 1 and 2 are described as having one spillway. This can be approved provided the applicant provides justification by demonstrating that the spill way is of nonerodible construction and designed to carry sustained flows. Currently the proposed MRP does not provide any description of how the spillways will be constructed. Please provide this justification.

R645-301-731.740 Maps containing pond locations should include location of inlets as well as the location of the spillways. Please update all maps containing the proposed ponds to show this information. Plate 2A should also be updated to include the location of ponds 1 and 2.

R645-301-731.750 Please submit maps with cross sections of the proposed ponds. These maps should include all relevant pond design information and elevations. Examples of these cross-section maps are found as Plates 3A-F in the currently approved MRP.

R645-301-742.221.36 For clarity purposes, please provide addition description in chapter 9, indicating that sediment markers will be placed in both ponds and will be clearly marked to indicate sediment cleanout levels as well as the 80%

water storage level.

adaniels

Maps Monitoring and Sampling Locations

Deficiencies Details:

R645-301-731.700 The following plates need to be updated as described: Plate 2A needs to be updated to include the newly proposed diversion channel, new ponds, new/updated drainage areas, and the new location of WCW-3; Plate 15 needs to be updated with the new drainage areas and the new location of WCW-3; and Plate 31 should be updated to show the new used of the "depression area".

adaniels

Reclamation Plan

Bonding Determination of Amount

Deficiencies Details:

In accordance with the requirements of R645-301-830.140, (Bond Amount) "will be based on, but not limited to, the detailed estimated cost, with supporting calculations for the estimates, submitted by the permit applicant."

Unit costs must be used as determined from the 2014 R.S. Means Heavy Construction Cost Data Manual.

phess