Coastal
The Energy People

May 30, 1995

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DIV. OF OIL, G

Daron R. Haddock
Permit Supervisor
Division of Oil, Gas & Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

Re: Newly Formatted Plan Deficiencies, Soldier Creek Coal Company, Banning Siding Loadout, ACT/007/034-94C, Folder ~~#3~~ 2, Carbon County, Utah

Dear Mr. Haddock:

The following is in response to your letter of May 5, 1995, to Mr. Rick Olsen of Soldier Creek Coal Company. Your letter describes several deficiences in the approved Banning Siding Loadout Permit. These deficiences will be addressed in the order in which they are summarized in your letter.

Deficiency 1. Soldier Creek needs to propose revegetation success standards for erosion control, diversity, seasonality, and effectiveness for the postmining land use.

Response Although it would be nice to have a proposed revegetation success standard included in the M&RP, we don't find that it is required in the R645-301-300 regulations. Any success standard that we may select today would probably not be accepted by the time revegetation occurs at this site. Therefore, we have elected not to include success standards in our M&RP. We feel that our committment to meet the requirements of R645-301-353 is adequate.

Deficiency 2. Appendix 5-[2] should be modified to show the size of the rainfall storm event that was used in designing the culverts. If the culverts are intended as permanent culverts (ie. they will stay after reclamation is completed) they must be designed to convey the flow resulting from the 100-year, 6-hour event.

Response Appendix 5-3 has been modified to include the calculations of runoff generated by a 100-year, 6-hour SCS Type 2 storm. Using the nomograph included in this Appendix it was determined that headwater depths for culverts #2 and #3 would be less than one-half the diameters of the culverts. For culvert #1 it was determined that the headwater depth would be around 5 inches above the top of the culvert which is less than the distance from the top of the culvert to the road

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surface. It has been shown that the culverts beneath the Banning haul road are sufficient to pass the flows generated by the above referenced storm. Appendix 5-3 is herewith resubmitted, in modified form, to replace Appendix 5-3 as contained in our submittal of March 29, 1995.

Deficiency 3. Table 5-2 should be modified to show the time period that the siltation structures will be removed in final reclamation.

Response R645-301-763.100 states that siltation structures (sedimentation ponds) will be maintained until removal is authorized by the Division. There are so many uncertain factors which determine the date for sedimentation pond removal that we do not believe it is possible for the Division to estimate a date on which it will give approval to remove the sedimentation pond. However, we propose that page 5.71 of the permit be revised as attached.

Deficiency 4. The small area exemption discussed in Section R645-301-742.240 should be demonstrated to produce no sediment or a sediment control measure must be designed and implemented on this site.

Response Appendix 7-9 in our March 29, 1995, submittal contains a SedCad demonstration that no runoff and no sediment yield are generated by a 10-year, 24-hour SCS Type 2 storm from SAE #1. We assume that the demonstration was simply overlooked during the review of the March 29 submittal, because no specific objections to the demonstration are mentioned in this deficiency. If we are incorrect in assuming this please let us know so we can make any necessary corrections. The demonstration is being submitted again with this response, for the convenience of your review.

Deficiency 5. The area on Exhibit 7.1 marked as Small Area Exemption No. 1 and that reports to the sediment pond should be removed from the map.

Response The text "Exempt Area No. 1 0.26 Acres" has been removed from Exhibit 7.1. Small Area Exemption No. 1 is correctly labelled on this exhibit as "SAE #1 0.36 Acres". Corrected Exhibit 7.1 is enclosed.

Deficiency 6. The Operator needs to identify those structures identified as concrete footings. The calculations must state what items are included in that term, such as the building's floor and foundation and the conveyor footings.

Response The cost of demolition of all concrete has been included in the cost of reclamation estimate. On page A-3 of the OSM Reclamation Cost Calculation Worksheets the

statement "All site concrete is included in this figure." has been added for clarification. Revised page A-3 is enclosed for replacement.

Deficiency 7. The Operator needs to include the off-site landfill fees for the buildings and the coal waste scheduled to be disposed of off-site.

Response No buildings or coal waste are scheduled to be disposed of off-site, therefore, landfill fees do not apply to the Banning estimated cost of reclamation.

Deficiency 8. The Operator needs to include support equipment and personnel in the earthwork calculations. Such items include a supervisor and his pickup truck and a water truck.

Response Pages A-7, A-10, A-11, A-15, and A-18 have been revised to include the costs of a supervisor and truck, and a water truck in the earthwork cost calculations. These revised pages are enclosed for replacement.

If there are any questions regarding the information submitted, please contact me.

Very truly yours,

For Rick Olsen
General Manager
Soldier Creek Coal Company