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ACT/COG/OST
file #2

Mine file
cc Pam
Susan White B
7-20-93

SUNNYSIDE COGENERATION ASSOCIATES

POST OFFICE BOX 58087
SALT LAKE CITY, UTAH 84158-0087

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JUL 16 1993

DIVISION OF
OIL GAS & MINING

July 14, 1993

Mr. Lowell Braxton
Division of Oil, Gas and Mining
3 Triad Center - Suite 350
Salt Lake City, UT 84180-1203

Dear Lowell,

This letter is in regards to a specific issue that was discussed at the meeting held June 30, 1993 at DOGM. The issue concerns Permit Condition #5, the fish inventory in Icelander Creek and Price River. SCA submitted a letter to DOGM on June 7, 1993 requesting that Permit Condition #5 be omitted from the Permit Conditions. DOGM sent a letter to SCA on June 15, 1993 denying this request. As a result, SCA committed to further investigation of the issue. Upon discussing the issue in the presence of Mary Ann Wright in the meeting at DOGM on June 30, 1993, SCA feels that the scope of work requested by DWR is excessive. The area of investigation does not accurately represent the area of influence where potential impacts may occur from the SCA operation.

Currently, DWR is requesting SCA to perform 4 transects on Icelander Creek, 2 transects on Grassy Trail Creek, and 2 transects on the Price River. The location of these transects will be determined prior to performing the inventories. In addition, recent information obtained from DWR has indicated that sampling of Icelander and Grassy Trail Creek will be necessary during both August of 1993 and Spring of 1994.

As stated in previous correspondence, SCA is not opposed to conducting fish inventories in areas adjacent to the SCA Permit Area, but does not feel that areas 14 miles downstream from the SCA Permit Site are not within a reasonable area of influence. It would be extremely difficult to differentiate impacts caused from the SCA operations with those impacts caused from other operations near Sunnyside. Some of the other operations in the immediate vicinity that could impact these drainages are:

1. East Carbon landfill,
2. Sunnyside Coal Mine,
3. East Carbon sewer lagoons,
4. East Carbon Development Corporation Landfill, and
5. SCA Ash Disposal site.

Originally, SCA was only to required to assist the DWR in performing these tasks, but due to "recent budget reductions", the DWR has requested that SCA perform the required work entirely at SCA's expense. SCA suggests a smaller scope of work be approved to include only Icelander Creek. One transect should be located near State Route 124 (the road to Columbia) and one downstream from that location.

Also, Susan White of DOGM mentioned some concern as to missing the spawning window in the study

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areas. She stated that it may be possible to perform a portion of the inventories during August, but to provide the best data possible, it would be best to conduct the inventories in the spring. SCA is opposed to performing the surveys more than once. SCA would like to conduct a site visit only once to obtain the necessary information.

If there are any questions, please feel free to call. We look forward to hearing from you.

Sincerely,

AEB for
David R. Pearce
Authorized Member, Management Committee

Alane E. Boyd
Alane E. Boyd, P.E.
Senior Engineer

*Pam, Susan - Can we
meet during week of 7-26 to
discuss a response. Thy
LMB*

Enclosure

cc: Brian Burnett, CDN
Pamela Grubaugh-Littig, DOGM
Joe Helfrich, DOGM
Mary Ann Wright, DOGM