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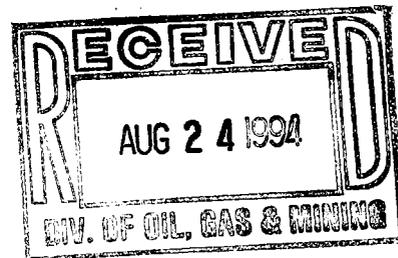
SUNNYSIDE COGENERATION ASSOCIATES

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

607/035 #2

August 22, 1994

Daron Haddock  
Division of Oil, Gas & Mining  
3 Triad Center - Suite 350  
Salt Lake City, Utah 84180-1203  
Phone: 538-5340  
Fax: 359-3940



**RE: Reclamation of Old Coarse Refuse Road ACT/007/035**  
**EC.45.05.93 NOV N93-32-5-2 #1 of 2**

Dear Mr. Haddock:

This submittal comes in response to the letter from the Division, August 15, 1994, which itemized the issues discussed in the meeting of July 20, 1994. Since that meeting, several representatives from DOGM (Henry Sauer, Susan White, Randy Harden, Bill Malencik, Ken Wyatt, Sharon Falvey) have visited the site of the reclamation work on different occasions and have seen the progress occurring.

The revisions to the text of PAP Chapter 10, submitted herewith, have addressed the items of your letter. These changes to the text, as well as the many visits to the site from the Division should allow you to find SCA's plan adequate.

SCA will continue to leave the surface roughened as observed during the site visits in order to break up the steep slopes, control direct runoff, and stabilize the surface. Additionally, the applications of organic mulch, as well as the interim seeding will assist in surface stabilization. Areas where the slope is steeper than 2H:1V will be stabilized by applying either excelsior-type matting or geosynthetic fiber roving.

During this past month SCA has taken samples from the soil underlying the coal material being removed. These samples were analyzed by ACZ labs and have an acid/base potential greater than -5 tons  $\text{CaCO}_3$  per 1000 tons material. One sample indicated a level of selenium at 0.17 mg/kg which exceeds the level indicated in the Guidelines (0.1 mg/kg). All other parameters analyzed were acceptable. A copy of the test results is included for your information. Additional samples have been taken and are being analyzed for SAR, Selenium, and Boron. These results should be available in a few weeks and should allow us to determine if selenium is actually occurring at that level. A copy of these results will also be provided to the DOGM at that time.

Preliminary investigation into this issue of selenium seems to indicate that the level of 0.1 mg/kg listed in the Guidelines does not necessarily indicate unacceptable soil. A Joint Selenium Task Force (Univ.of Wyoming, OSM, Wyoming DEQ-Land Quality, and others) is

currently completing a research project related to selenium in the soils of coal mining reclamation sites in the state of Wyoming. Some of this research recommends that for levels of selenium in the range of 0.15-0.25 mg/kg, additional vegetation monitoring should be conducted after the third growing season, but that the soil should not necessarily be removed or additional bond required.

In the event that the additional soil samples show higher levels of selenium in the range of 0.15-0.25 mg/kg, SCA will commit to additional vegetation monitoring. SCA believes that the depth of borrow material being placed on the outer slopes should be adequate to provide soil that is comparable or better than the natural material that exists on that slope.

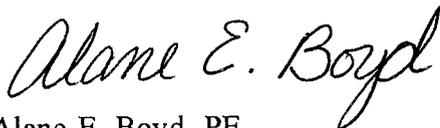
The atriplex / grass seed mixture has been compiled because of its compatibility in the area. The shorter root length will also help the vegetation to become established mostly in the borrow material cover. Although SCA has committed to a minimum six-inch layer of borrow material, the contractor has been instructed to place borrow material on the outer slopes to an average depth of approximately one-foot.

The issue concerning the burning portion of the area undergoing reclamation is not expected to curtail reclamation of the road. SCA is extinguishing the burning material as directed by the applicable regulations and is expending the additional effort to reach abatement of the NOV. SCA is progressing with the installation of the approved hydrologic controls and completing the reclamation of the road.

Sincerely,



David R. Peatee  
Authorized Member, Management Committee



Alane E. Boyd, PE  
Senior Engineer

cc: Brian Burnett  
Bill Malencik

Enclosures: Soil analyzation results  
Chapter 10 submittal

AEB:ssc