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File ~~INA~~ 015/022
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* copy to Sandy Pruitt



SOLDIER CREEK COAL CO.

Telephone (801) 637-6360

P.O. Box I
Price, Utah 84501

May 8, 1985

RECEIVED

MAY 09 1985

DIVISION OF OIL
GAS & MINING

Ms. Susan Linner
Division of Oil, Gas and Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, UT 84180-1203

Re: Abatement of NOV No. N85-2-4-2 2 of 2
Soldier Creek Coal Company
Hidden Valley Mine
INA/015/022

Dear Ms. Linner:

Soldier Creek Coal Company is requesting a small area exemption, in accordance with UMC 817.42(a)(3), for the gravel storage pile at Hidden Valley Mine. This request is being made with the belief that any surface drainage from this pile will meet the applicable State and Federal effluent limitations and/or will not degrade any receiving waters. This is based on the following information:

1. The gravel storage pile is located on an existing dirt road, therefore, there is no additional surface disturbance associated with this pile.
2. The total area in question is small - less than 0.1 acre.
3. The gravel pile is essentially stabilized against erosion. The immediate surface is covered with a coarse gravel, approximately 1/4" to 1/2" in diameter with the interior containing gravel mixed with finer material. There are no visible signs of erosion or rills forming on the pile.
4. The expected runoff volume should be minimal due to the high absorption rate of the material. Using the Soil Conservation Service curve number methodology, the runoff volume is as follows:

10 - Year, 24 - Hour Event = 1.69 inches
 CN = 70
 P = 1.69 inches
 Direct Runoff = 0.14 inches
 Total Runoff = area x direct runoff
 = (0.1 acre) x (0.14 inches)
 = 51 ft³

Ms. Susan Linner
May 8, 1985
Page 2

5. A containment berm/ditch was constructed around the gravel pile on April 25, 1985, (see April 22, 1985 D.O.G.M. inspection memo and April 30, 1985 D.O.G.M. abatement extension correspondence). Assuming 0.1 acre total area and 51 ft³ total runoff, the cross-sectional containment area of the berm/ditch must only be 0.19 ft² for total runoff containment. The constructed berm/ditch is well in excess of the required cross-sectional area.

Soldier Creek Coal Company requests that a small area exemption be granted for the gravel storage pile at Hidden Valley Mine. It is also requested that the berm, which was constructed as an interim abatement measure only, should not be a requirement under the small area exemption. Based on the physical characteristics of the stockpiled material, as well as the small size of the area and minimal quantities of runoff expected, it is believed that any runoff would comply with the requirements of UMC 817.42(a)(3).

If you should have any questions, please do not hesitate to contact me.

Sincerely,

SOLDIER CREEK COAL COMPANY



Dave Spillman
Mine Engineer

DS:pp

cc: Ms. Sandy Pruitt - Division of Oil, Gas and Mining