



The Fetterolf Group

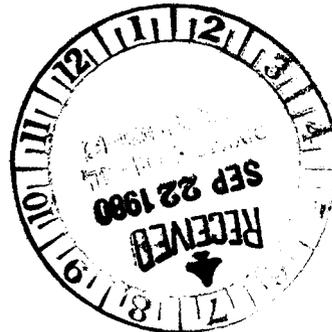
TLP

To Joe & Tom
JWS Jus

ACT/015/009

September 17, 1980

Mr. James W. Smith, Jr.
 State of Utah
 Department of Natural Resources
 Division of Oil, Gas, And Mining
 1588 West North Temple
 Salt Lake City, Utah 84116



RE: Trail Mountain Coal Company

Dear Mr. Smith:

I am in receipt of your September 8, 1980 letter requesting additional information concerning the Division Directive issued July 31, 1980.

I discussed this matter with Tom Suchoski by telephone on September 16, 1980. This reply is being written based on that conversation.

1. Submit detailed plans for Division review and approval for the disposal of waste material, i.e., the refuse pile located above the temporary sediment pond, as described under Section 817.71-74 of the performance standards.

The waste material was removed and hauled away by W.S. Hatch Company. They also arranged for the disposal at a land fill site. I am not aware of the details of the disposal.

Submit detailed plans for Division review and approval concerning the potential for suitable growth media of the slope remaining after the coal refuse has been removed as described in Section 817.21-25 and 817.111-117 of the performance standards of the permanent regulatory program. Revegetation requirements are also included in the above-mentioned sections.

It is my understanding that the waste material was originally placed by dumping. Therefore, removal was completed without requiring any excavation of the canyon walls. The result is that original slopes have been maintained. We have been advised by both the Forest Service and the Soil Conservation Service that chances of vegetating the slopes are very slim. However, an attempt will be made to establish growth using the following mix recommended by the Soil Conservation Service: Pubescent wheat grass @ 4 lbs./acre; Indian Rice Grass @ 4 lbs./acre; and Yellow Sweet Clover @ 2 lbs./acre.

2. The Division approves the use of the existing sedimentation pond with the installation of the outlet structures described in the March 1980 Johansen & Tuttle plans as a temporary measure, until approval and implementation of permanent compliance measures. Detailed permanent plans and drawings must be submitted by November 15, 1980 for Division review and approval. Implementation of the approved permanent plans must be completed by June 30, 1981. Justification for this action is that the existing pond is inadequately sized and is not sealed, and the stability of the pond is questionable. Also, drainage from the pad via berms and ditches leads to continuous maintenance situations and possible additional violations.

Based on the above approval, the outlet structures for the existing pond are currently being installed. Detailed permanent plans were previously submitted, however, they were disapproved because of the amount of disturbed area. The pond was sized as required and therefore was located in the only area available to construct the facility.

In a preliminary meeting with Forest Service prior to submission of the plans, no objections were raised regarding the disturbed area. Because of the limited space available, there are no alternatives to those already submitted. Suggestions from your Division would be welcomed.

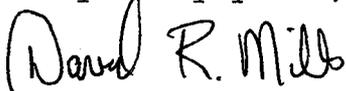
The justifications for this action are being remedied under the current construction phase. The existing pond is being cleaned and enlarged, the dikes are being sealed, and compacted to insure stability. As for the use of berms and ditches from the pad, this is an acceptable method of sediment and erosion control. Continuous maintenance is our responsibility and the chances for additional violations are always present irregardless of measures taken to prevent them.

3. Submit plans showing location of the culvert sites for stream crossings at the access points from the Forest Service road and show that grading will control and prevent run-off from by-passing the sedimentation pond.

It is apparent from the past correspondence that the culverts have been requested for some time. In my conversation with Mr. Suchoski, he was in agreement that no new location maps would be required since they were previously submitted. Current plans are to grade the area to the maximum extent feasible to prevent any run-off from leaving the site. Complete drawings will be submitted after installation is complete. The actual grades will have to be determined in the field since care must be taken not to slope any area in a manner that would prevent the coal trucks from traveling in and out of the mine yard.

Mr. Suchoski has requested a meeting in the field for the week of October 20, 1980. Such a meeting is agreeable and I would appreciate confirmation on a meeting from the Division.

Very truly yours,



David R. Mills, P. E.
Mining Engineer

cc: Tom Rice
Howard Tuttle

DRM:cmb