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BEAVER CREEK Coal Company

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File Act/015/009#2



DIVISION OF
OIL, GAS & MINING

Nov. 8, 1990

Pamela Grubaugh-Littig
Permit Supervisor
Utah Division of Oil, Gas & Mining
355 West North Temple
3 Triad Center, Suite 350
S.L.C., Ut. 84180-1203

Re: Amendments 90E, 90F, 90G & 90H
Trail Mountain No. 9 Mine
ACT/015/009
Emery County, Utah

Dear Ms. Littig:

This letter is the Beaver Creek Coal Company response to the U.S. Forest Service concerns expressed in their letter to Lowell Braxton on Nov. 6, 1990.

Each of the U.S.F.S. comments are addressed in the order of their letter:

(1) Storage/Loadout Bin - The proposed new loadout system represents only the first phase of what we hope to be a much larger expansion. This system has been designed by our engineering staff, and represents the most economic and efficient system for our present and near-future needs. The system, as well as the truck-haulage contract, is designed to move coal rapidly from the mine site to minimize on-site storage. The 600 ton bin has been evaluated, and was found to be the best for our existing production and budget scenarios. If the need for additional capacity should develop in the future, a second bin or other covered storage could be justified and provided at that time.

In the long-term, as justified by increased productivity or demand, a larger, more elaborate system may be considered, including a silo, stacking tubes and reclaim tunnels.

It should be noted that the by-pass chute will be covered as suggested.

(2) Beaver Creek Coal Co. is working with the Utah Department of Health to evaluate the existing sewage system as well as the need (and designs) for expanding the system. All required approvals will be obtained from the Department of Health prior to modification of the system.

(3) **Macroinvertebrate Study** - Appendix 10-7 in the Trail Mountain No. 9 Mine M.R.P. contains both the Interim and Final Reports of the Cottonwood Creek Macroinvertebrate Studies conducted during 1985-1986. The study was performed by Dennis K. Shiozawa of Brigham Young University under the direction of the Utah Division of Oil, Gas and Mining and U.S. Department of Interior (O.S.M.). The conclusion reached during the study was that "the impact of the Trail Mountain mining operation on the Cottonwood Creek invertebrate community is negligible as determined by the prescribed sampling program." The conclusion also stated that it did not appear that additional studies need to be conducted. This conclusion was also supported in a letter from John Livesay, Supervisor, Utah Division of Wildlife Resources, Southeastern Region on Nov. 25, 1986. In this letter, Mr. Livesay wrote: "As a result, we concur with the author that additional studies relative to mining are not necessary." The program was terminated after that time.

Beaver Creek Coal Co. has proposed mitigation measures to compensate for the loss of riparian area resulting from the culvert extension. In addition, Beaver Creek has an on-going program of water monitoring, which includes water quality samples on 3 points in Cottonwood Creek.

(4) **Facility Colors** All new facilities will be painted a color that is consistent or compatible with the other facilities.

(5) **Culvert Bedding** - Sand used for bedding will have adequate plasticity to prevent piping around the inlet. In addition, the existing inlet structure will be duplicated at the new inlet, and a cutoff structure will be installed.

(6) **Culvert Backfill** - Since the backfill around the culvert will be mechanically tamped, care will be taken to avoid placing rocks greater than 3 inches in diameter within 1 foot of the culvert.

Amendments 90E, 90F, 90G & 90H
Trail Mountain No. 9 Mine
ACT/015/009
November 8, 1990
Page 3

It is our hope that this response will adequately address the remaining concerns of these projects. If you have any questions, or need any further information, please let me know.

Respectfully,

Dan W. Guy/pd

Dan W. Guy
Mgr. Permitting/Compliance

cc: George A. Morris - Forest Supervisor
Johnny Coffey
Dana Echter
Dave Arnolds
File