



Kevin L. Cheeks, P.E.
Supervisor -
Environmental Quality Control

Consolidation Coal Company
Mid-Continent Region
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(314) 275-2415

January 14, 1992

Mr. Daron R. Haddock
Permit Supervisor
Utah Division of Oil, Gas and Mining
355 W. North Temple
3 Triad Center - Suite 350
Salt Lake City, UT 84180-1203

RECEIVED

JAN 16 1992

DIVISION OF
OIL GAS & MINING

Dear Mr. Haddock:

Re: Emery Mine, Permit #ACT/015/015
Responses to Inspection Report Dated 12/19/91

As required by the above referenced inspection report, Consolidation Coal Company herein submits its responses to all items of concern. The following responses are identified using the same format as that shown in the report.

1. Permits

d. A signed copy of the current permit, which was renewed on January 8, 1991 is attached. Please note that the attachment includes a copy of a January 25, 1991 transmittal letter through which the Division's signed copy was previously returned by Consol. A photocopy of the presently transmitted document has been retained for our files. If the Division's copy, sent on January 25, 1991, is ever located, we would appreciate the return of one of the documents containing original signatures.

f.1 Copies of Plates II-1 and IV-10 are attached and have been updated to show an existing drainage culvert on the substation access road. Although the inspection report requests that Plate VI-10 be updated to show this culvert, no changes to this plate have been made. Due to the scale of Plate VI-10 (1 inch = 500 feet) and the absence of any other road culverts being displayed, except for the large arch culvert on Quitcupah Creek, the display of such a small feature is felt to be impractical. New and revised pages to the MRP are attached and include Chapter IV, Appendix IV-7-C pages 5 of 10 and 5a of 10.

already #22/92
placed in bond file
these copies returned.

Mr. Daron Haddock
January 14, 1992
Page 2

f.2 Consol has requested (letter dated 1/13/92 K. Cheeks to F. Corder) that the Bureau of Air Quality evaluate the applicability of their permitting regulations to the existing Emery Deep Mine facilities. A copy of this letter is attached. Chapter X.C - Air Quality in the mine's MRP will be updated after a final resolution of our request with the Bureau of Air Quality occurs.

4. Hydrologic Balance

e. Following review of Mr. Lowell Braxton's October 30, 1991 letter on surface and groundwater monitoring and a discussion with Mr. Rick Sommers of your department on the same, the following changes in water monitoring reports will be made.

- (1) All laboratory reports will display appropriate field data, be signed by a responsible laboratory employee and report if any parameter analysis exceeds holding times outlined by standard methods.
- (2) An updated summary, listing applicable analytical methods and detection limits for each parameter will be mailed to the Division no less than annually.
- (3) The name of individuals taking samples will be reported on a chain of custody letter that will accompany the samples to the lab. These letters will be filed at the lab.

If you have any questions concerning these matters, please contact Richard Denning at the above location.

Sincerely,



Kevin L. Cheeks
Supervisor
Environmental Quality Control

KLC;rjd:vms

Attachments