

September 8, 1978

Route  
KMP

Memo To File:

Re: Variance on Utah Power and Light Co.  
(U.P. & L.) Access Roads to Church  
Coal Mine and to Deer Creek Coal Mine.

Mr. Don Dewey and Mr. Karl Gurr, of the engineering staff representing U.P. & L. met with Ron Daniels and Mike Minder on Wednesday August 24, 1978 at the U.P. & L.'s office (41 North Redwood R.) to discuss the E.I.S. and accompanying plans submitted to our office by their firm. Upon review this material, certain discrepancies appeared and it was felt that they should be explained to U.P. & L. to give their staff an opportunity to correct them before proceeding with the requested variance.

There were three issues which were in question: First concerned the feasibility and quantity of runoff from the watershed to be diverted and stored in underground sumps within the Church Mine. Second was the grade of the proposed access roads which do not conform with the O.S.M. Performance Standards. Last but not least was the excessive earthwork portrayed in reestablishing access roads to both mines. Also mentioned were the drawings and report, both being sketchy, vague, and incomplete.

After a lengthy discussion, Mr. Dewey was fully cognizant of the deficiencies inherent in their plans and material, however, wishing to avoid any further delays which would arise in redesigning new access roads, he elected to proceed without making corrections.

Mr. Dewey and Mr. Gurr stated that they had replaced the firm Pullman-Torkelson Co., who had prepared the reports and now employed a new firm, Morrison - Knudsen Co., Inc., to complete the work. He was very apologetic, and attempted to excuse the errors stating that in their haste, they neglected to review the material prior to submittal.

We acknowledge U.P. & L.'s position on the access roads and agree that a new design would be academic at this point in time. It is our opinion, that to require construction of a new access road meeting O.S.M. Performance Standards in place of the existing roads would serve no useful purpose, and would in fact generate more sediment and promote erosion. This variance is especially valid because the present roads have been in use for several years; having stabilized, they are operating adequately and present no erosion problems. It is our feeling, concerning the variance, that it be determined on these merits and not as presented in the E.I.S. and the accompanying material.

U.P. & L. is looking into the sediment pond design and will re-evaluate runoff diversion and storage quantity to be placed in mine sumps. When completed, they will forward their findings to the Division.

MICHAEL T. MINDER  
RECLAMATION ENGINEER

cc: O.S.M., Denver