


**GENWAL COAL COMPANY**

*ged  
FILE FOLDER #5  
ACT/015/032*

June 27, 1991

Mr. Joe Helfrich  
Division of Oil, Gas & Mining  
3 Triad Center, Suite 350  
355 West North Temple  
Salt Lake City, UT 84180-1203

**RECEIVED**

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RE: Permit # ACT 015-032  
Genwal Coal Company  
NOV 91-37-2-1

DIVISION OF  
OIL GAS & MINING

Dear Mr. Helfrich:

This letter is a follow-up of our June 26, 1991, phone conversation in regards to postponing Genwal Coal Company's assessment conference for state violation N91-37-2-1 to a later date.

As I explained in the phone conversation, the date the Division had set for the conference, July 9, 1991, falls during Genwal's vacation period. We appreciate the Division's ability to work well with us in rescheduling the conference date on this violation.

This letter is also to inform you that I followed up on the phone conversation we had on June 26, when you informed me that the Division has changed its policy requiring a separate conference to appeal the fact of NOV's. A letter has been written to Diane Nielson requesting this additional conference.

In that letter Genwal requests, if possible, that these two conferences be held on the same date. This would help us due to the distance and time element of travel. Again, please inform us of an opportune date that these two conferences could be established.

Should you have any questions or need additional information, please contact me at 687-9813.

Sincerely,

GENWAL COAL COMPANY

*Randal*

Randal J Ralphs  
Surface Foreman

tr

GENWAL COAL COMPANY

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DIVISION OF OIL GAS & MINING

June 27, 1991

Mr. Daron Haddock  
Division of Oil, Gas & Mining  
3 Triad Center, Suite 350  
355 West, North Temple  
Salt Lake City, Utah 84180-1203

RE: Permit # ACT 015-032 *Amendment 91B*  
Genwal Coal Company

Dear Mr. Haddock:

During our meeting today the concerns relating to the road, and crusher projects were discussed. Genwal Coal Company plans to upgrade the portion of the road which lies on permitted property immediately upon approval by DOGM. It was known that OSM has temporarily stopped Genwal from upgrading the Forest Service portion of the road. The Forest Service road below the permitted area will be upgraded once the Forest Service and OSM come to an agreement on the public road issue. The Forest Service Trail-head improvements and expansion of the Genwal parking area are not to be considered at this time but will be reevaluated at a later date. (See Sheet #9 of previously submitted Johansen and Tuttle map) The following concerns were discussed:

Soils:

1) Soil and Rock generated from the blasting project, the large rock (boulders), and material from the borrow area designated for removal off-site, will be sampled concurrent with the transportation of the material to an approved location. The sampled material will be analyzed for the following parameters:

- a) PH
- b) Electrical Conductivity
- c) Particle Size Analysis (texture)
- d) Soluble Ca, Mg and Na
- e) Selenium
- f) Sodium Adsorption Ratio (calculation)

2) Material stored in the temporary storage area for longer than 30 days, will be tested for the above parameters. See attachment #1 for location of temporary rock storage area. Material tested in the temporary storage area will not be required to be re-tested when transported to a permanent disposal area.

3) An amendment to the CVR mine reclamation is submitted as attachment #2. The amendment will allow for a one time opportunity to dispose of material from the blasting and clean up projects. A maximum of 600 cyds can be disposed of at the CVR once approved by DOGM. It is anticipated that the permit now under review will include a provision to allow the disposal of waste rock at the CVR in the future.

4) Topsoil disturbed during construction will be transported to and deposited on an existing topsoil pile. The pile will then be revegetated if necessary, with the seed mix specified in the approved MRP.

5) The design height of the barrier protecting the top soil piles is inadequate. The barrier should be a minimum of a straw-bail high (18" to 24").

#### Hydrology:

1) Construction will encroach upon SAE-3. The area of SAE-3 will be reduced corresponding to an increase in disturbance reporting to the pond. A map reflecting the change in SAE-3 is being submitted as attachment #3.

2) If any runoff in the Gabion wall area does not report to the sediment pond then an alternate sediment control plan will be implemented. This alternate plan will involve installing silt fence or equivalent at the down-slope of the newly disturbed area. The silt fence or equivalent will be installed according to the approved MRP.

3) The contractors sediment control plan required by the USFS has been submitted and is included as attachment #4.

4) To help clarify some confusion section 10-6 of our approved MRP has been rewritten. During construction which occurs within 100 feet of Crandall Creek, water samples will be taken and on a weekly basis for the following parameters: TSS, pH, EC, and water temperature. In addition a turbidity measurement will be taken daily during construction. Testing of samples will be completed at a certified lab or performed in the field. The revised 10-6 section is included as attachment #5. Please replace pages 10-6, 10-7, and

10-8 of the approved MRP with the newly revised pages.

Engineering:

- 1) A blasting plan approved by a Certified Coal Mine Surface Blaster is included as attachment #6.
- 2) The Certified Blaster approving the blasting plan will be on site during the loading and blasting operations.
- 3) Sediment controls will be installed prior to construction to the extent practical.
- 4) The contractors traffic control plan is included as attachment #7.
- 5) A Hawk and Eagle ground survey was conducted and included as attachment #8.

Thank you for a very constructive meeting. Your cooperation and concern is always appreciated.

If you have any questions or comments please call.

Sincerely;

*R. Jay Marshall*  
R. Jay Marshall P.E.  
Chief Engineer  
Genwal Coal Company