

GENWAL COAL COMPANY

January 13, 1995

Mr. Steve Demczak
Mining Engineer/Reclamation Specialist
Division of Oil, Gas, and Mining
%College of Eastern Utah
451 East 400 North
Price, Utah 84501

Dear Steve:

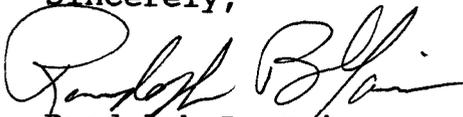
In an effort to improve efficiency, reduce disturbance to the vegetated and stabilized topsoil stockpiles and provide for reduction in sedimentation at the Crandall Canyon Mine, Genwal respectfully requests that the three topsoil stockpiles be designated as Small Area Exemptions.

We are providing the backup information which documents that SAE 5, 6, and 7 have sufficient vegetative cover to prevent erosion and the capability of trapping settleable solids. We wish to terminate the need for strawbale dikes or alternative sediment control. Genwal is supplying the Division with three (3) copies of the backup documentation of SEDCAD+ for your review. After the review is complete and the data are accepted, then appropriate changes will be made to the MRP.

Presently, DOGM regulations dictate that topsoil stockpiles SAE 5, 6, and 7 DOGM be protected from excessive erosion and sediment by strawbale dikes and silt-fences until established vegetation negates the need for erosion control measures. Inspections by Genwal personal indicate that the vegetative cover is sufficiently established to protect the soil resources. At this point in revegetation, more damage is done to the vegetative cover and the potential erosion created on the topsoil stockpiles by maintenance of the strawbale dikes (replacement of the old bales) than the erosion and sediment transport that would exist under the current natural setting.

If you need additional information, please call me at (810) 687-9813.

Sincerely,


Randolph B. Gainer, P.G.
Environmental Manager