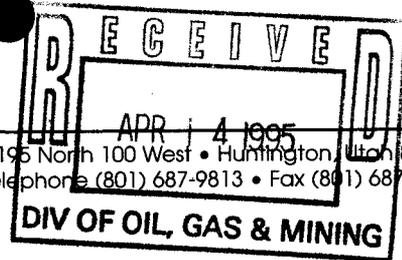


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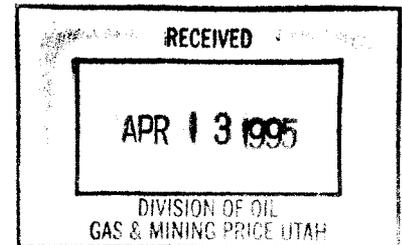
GENWAL
RESOURCES, INC.



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April 11, 1995

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



Re: Response to Forest Service comments for the Longwall Amendment, Genwal Resources, Inc., Crandall Canyon Mine, ACT/015/032. # 2

Dear Daron:

Genwal Resources, Inc. is pleased to be able to respond to your March 28, 1995 letter in a timely manner. I have met with representatives of the Price office of the U.S. Forest Service to discuss their two comments associated with our Longwall Amendment.

Their comments and Genwals response are:

Page 7, Pumping from Crandall Creek

Genwal has committed to not dewater Crandall Creek. They should actually commit to maintaining a minimum in-stream flow, which will be determined during 1995.

Both Genwal and the Forest Service desire to maintain a minimum streamflow in Crandall Creek which will sustain the Flora and Fauna of the stream and its perimeter. It is important to note that Genwal does not pump continuously from Crandall Creek. Pumping is conducted a few times per week or month for 2 - 3 hours at a time. The pumping rate is conducted at a rate which leaves sufficient water to maintain downstream flows. As previously mentioned, Genwal has committed to use existing and new field data to determine maximum pumping rates for various flow conditions. The minimum flow requirements coupled with the maximum allowable pumping rates will ensure that Flora and Fauna are sustained. These data will be forwarded to both the Division and the Forest Service in 1995.

Page 7, Water Quality Impacts

Genwal is aware that they are impacting Crandall Creek by the salt used for ice removal and by coal dust. Both these items must be addressed and appropriate mitigation proposed. The coal dust may become more of a problem as coal production

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increases from 1.6 million tons per year to approximately 2.5 million tons per year.

Genwal uses the identical salt/sand mixture as that used by UDOT. However, because of the steepness of the mine and trailhead access road, larger volumes of the mixture are applied during severe storm conditions. Potentially salt-laden snowmelt runoff from the facilities and disturbed area of the mine itself is collected in the sediment pond.

The mine access road is not within the permit boundaries, nor are any mitigation measures to satisfy the Forest Service comments associated with the access road a part of the MRP. Under current conditions mitigation includes silt fencing and straw bale dikes being maintained at critical points along the road to trap the salt-laden sediment. The sediment buildup is removed as required for proper function of the silt fence. While it is true that salt stained insitu soils have been observed in the intermittent drainages leading to Crandall Creek, no salt-laden sediments are observed to have reached Crandall Creek.

The salt which may reach the stream is in much lower concentrations when in suspension and thus greatly reduces the potential for downstream impacts. A significant amount of the salt remains with the sand mixture and the "road-grime" and is not contacting Crandall Creek.

In an effort to satisfy the Forest Service concerns and to ensure that environmental impacts are minimized, the following actions are proposed to mitigate the Forest Service concerns. They are:

1. Silt fences will be installed at the outlet of each culvert, drain or significant point of runoff from the road. Forest Service approval will need to be obtained to allow installation of the silt fences. The silt fences would be maintained and accumulated sediments removed when required.
2. Genwal will investigate the possibility of using a coarse sand mixture instead of the fine sand mixture which it is currently using. The coarse sand will not easily be carried in the runoff water nor will it become suspended sediment.
3. Genwal contracts on an annual basis with a local construction company to sweep the accumulated salt/sand mixture from the road, clean the ditches, and repair damaged portions of the runoff control system. Genwal commits to continue the annual road and ditch cleaning. Thus, greatly reducing the potential for salt-laden sediment to impact the stream.

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4. During the summer and early fall of 1995, a suite of soil samples will be collected downgradient from 25 percent of the drainages, prior to the drainage entering Crandall Creek. The soils will be analyzed in a certified laboratory for salt concentrations (NaCl) and those concentrations will be compared to background concentrations. When the data have been assessed a meeting will be held in mid-November with representatives of the Forest Service to discuss the results and the need for additional mitigation, if any.

5. Genwal has and continues to comply with the State of Utah, Division of Air Quality regulations associated with coal dust emissions. Existing data indicate that fugitive coal dust emissions are not significantly impacting the environment within Crandall Canyon or Crandall Creek.

6. Genwal has agreed to conduct the macroinvertebrate every three years to ensure that salt is not impacting Crandall Creek. The results of these studies will also be used to determine if additional mitigation measures are necessary.

Again, thank you for your timely review on these matters.

Sincerely,



Randolph B. Gainer, P.G.
Environmental Manager