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Thomas L. Gambill
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Subsidiary of
Coastal States
Gas Corporation

February 2, 1978

State of Utah
Department of Natural Resources
Division of Oil, Gas and Mining
1588 West North Temple
Salt Lake City, Utah 84116

*Convulsion Cyn. Mine
Act 1041/002*

Attention: Mr. Cleon B. Feight, Director

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Gentlemen:

As we discussed over the telephone, we are proposing an alternate approach to comply with regulations concerning the sediment pond for our Southern Utah Fuel Company division.

Southern Utah Fuel Company operates a large underground coal mine in Sevier County, Utah. The site of the mine's surface facilities is in a narrow canyon and these facilities cover a few acres (less than ten) on a compacted earthfill pad in the bottom of the canyon. The mine produces 1.5 million tons per year. Crushing and minimal storage are the only processing operations conducted on the surface at the mine.

At the direction of the United States Geological Survey, a large capacity drainage system was constructed about two years ago consisting of four (4) and six (6) ft. diameter drainage culverts extending completely under the surface area at the mine site. This system permits 100% of the water shed runoff from above the mine to bypass the mine site. Under the same directive of the United States Geological Survey, a surface water clarification structure was designed to entrap coal dust, oil and other debris which might be otherwise washed into the canyon from the mine site surface area during two inch per hour rains of six hour duration. As a matter of coincidence, the Federal Environmental Protection Agency promulgated the coal facility point source discharge regulations while our water clarification structure was being designed. We submitted our surface water treatment design to the Environmental Protection Agency and received their concurrence that the structure was sufficient to comply with their regulations.

Enclosed for your information are three copies of drawings of the water treatment structure that we built at Southern Utah Fuel Company. This structure catches all

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runoff water originating at the mine site surface facilities and as far as we can tell, eliminates all of the larger sized suspended solids and floating oil from the runoff water. In my opinion, this facility is sufficient to comply with the intent of the Federal Strip Mining Act.

Due to the topography at our mine site, there is no room to construct a sediment pond to the specification set forth in the new Federal Strip Mine regulations. Essentially, every square foot of level or near level land is utilized by the mine's surface facilities. The nearest flat area where it would be feasible to construct a sediment pond that would meet the new regulations is approximately 11,000 feet away in another canyon and approximately 1,200 feet lower in elevation than the mine site. The sediment pond site would be located off of our mining lease on presently undisturbed national forest land. The surface runoff water would have to be transported to the pond site from the mine site by pipeline which would greatly increase the turbidity of the water due to it's velocity in falling that many feet in elevation. This would compound the clarification problem in the sediment pond.

We respectfully request that our present surface runoff water clarification facility be accepted as complying with the Federal Strip Mining Act. We see no way that we can construct a sediment pond to comply with the new Federal Strip Mine regulations.

Very truly yours,



T. L. Gambill
Vice President, Mining

TLG/ta
Enc.