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February 24, 1978

Mr. Thomas Gambill
Vice-President, Mining
Coastal States Energy Co.
Five Greenway Plaza East
Houston, TX. 77046

#2

Re: Sediment Control Measures
Southern Utah Fuel Company
Convulsion Canyon Coal Mine
ACT/041/002

Dear Mr. Gambill:

The Division agrees that the topography at the mine site prohibits the use of a conventional sediment control pond, and construction of a pond off-site would disturb more land than necessary.

Part 717.17(e) of the Federal Surface Mining Reclamation and Enforcement Provisions (PL 95-87) states that sediment traps may be utilized for preventing additional contributions of sediment to streamflow or to runoff outside of the permit area. The facility's capacity must treat runoff resulting from the 10-year, 24-hour precipitation event. The 10-year, 24-hour precipitation event for the mine site is approximately 1.9 inches. Runoff estimated by the Soil Conservation Service runoff method is 0.50 area inches. Assuming a pad of 10 acres, total storage to contain runoff resulting from the 10-year, 24-hour storm is 18,150 cubic feet.

The flood sediment tank, as designed, will hold approximately 856 cubic feet, less than half of the estimated runoff from the design storm. Therefore, the structure does not pass the requirements if its purpose is to settle out sediment by containing runoff. However, if filters or chemical treatments are used, the structure may come into compliance so long as there are commitments to maintain the system and to meet the applicable effluent standards.

Before approval can be given, the following questions also need to be answered. Where will the sediment collected by the trap be deposited? How is runoff collected by the trap discharged? Is discharge from underground workings routed through the trap?

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The Division recognizes Coastal States' problem of limited space. Modification of the existing facilities appears to be the most reasonable course of action to comply with the Federal regulations. If you have any questions, please feel free to call.

Thank you for your cooperation.

Sincerely,

DIVISION OF OIL, GAS, AND MINING

K. MICHAEL THOMPSON
RECLAMATION HYDROLOGIST

/tlb