0001

Coastal States Energy Company

411 West 7200 South
Midvale, Utah 84047
(801) 566-7111

file ACT/041/002

Subsidiary of
The Coastal
Corporation

January 15, 1981

RECEIVED
JAN 15 1981
DIVISION OF
OIL, GAS & MINING

Mr. Joseph C. Helfrich
Department of Natural Resources
Division of Oil, Gas & Mining
1588 West North Temple
Salt Lake City, Utah 84116

Dear Mr. Helfrich:

Re: Extension of Time to Comply
with Violation Abatements.
Notice Violation No. N 80-1-13-2
Violation Nos. 1 & 2

Accompanying this letter are materials to abate the violations incurred during the construction of the sedimentation pond. The abatement procedures outlined in the inspection report are essentially complete for both violations. One exception is that Dames & Moore is presently completing a soils investigation to demonstrate a 1.5 safety factor for Violation No. 1.

On January 9, 1981, I, with representatives from Dames & Moore, and Mr. Lee Spencer of your office, met to discuss the preliminary soils findings. It was decided at that meeting to perform some additional analyses in order to verify the findings of the preliminary studies. In order to complete the additional tests, more samples were taken in the field and delivered on January 14, 1981 to the Dames & Moore Lab to complete the testing. Their report should be done within ten days. May we please have an extension in order to complete their report and submit it to you.

Sincerely,

Allon C. Owen

Allon C. Owen, P. E.

ACO/jc

Enclosures

File ACT/007/005

Jim

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DIVISION OF
OIL, GAS & MINING

Mr. James W. Smith, Jr.
Coordinator of Mined Land Development
Division of Oil, Gas and Mining
1588 West North Temple
Salt Lake City, Utah 84116

Re: Southern Utah Fuel Company
Convulsion Canyon Mine
ACT/041/002
Sevier County, Utah

Dear Mr. Smith:

The purpose of this letter is to document our proposal to abate violations No. N 80-1-13-2, numbers 1 and 2.

Violation No. 1 of 2

Nature of Violation

Failure to retain all earth, rock and other mineral non-waste materials on the solid portion of existing or new benches of road cuts, mine workings, or other benches.

Portion of the Operations to Which Notice Applies

Access road to sediment pond downslope areas.

Remedial Action Required (Including Interim Steps, If Any)

Request a variance from the Board of Oil, Gas and Mining in which a long-term static safety factor of 1.5 is demonstrated.

Proposed Actions to be Taken by Southern Utah Fuel Company (SUFCo)

SUFCo is requesting a variance of Mc 717.14(a)(1) and c, Title 40-10-17c for the access road to the sedimentation pond. SUFCo is also requesting a modification of the road location as shown in Figure 1. The following summarizes the reasons for making these requests:

1. A study of various possible locations for the sedimentation pond showed that the pond location used creates the least environmental disturbance, and also places the pond within the lease boundaries.

2. The road to the pond as shown in Figure 1 represents the only feasible access route.

3. Soil conditions are such that though limited sluffing may occur, no major environmental damage is probable.

4. Use of the road will be limited to maintenance equipment - dozers and front-end loaders. Normal maintenance will involve sediment removal to preserve adequate sediment storage in the pond. Frequency of sediment removal will likely be less than once every 2 or 3 years.

5. Location of the road should be changed in order to avoid cutting into the loose fill material north of the sedimentation pond. Such a cut likely would have resulted in a very unstable situation on the face of the loose fill.

The following steps will be taken by SUFCo to minimize the adverse conditions existing along the road.

1. Drainage will be established by use of ditches, berms and water bars as shown in Figure 1. Erosion and excessive wet conditions on the cuts and side cast slopes will be minimized.

2. A locked gate will be installed at the head of the road to limit access to the road.

3. Cut slopes, side cast material, and the road itself will be seeded and hydromulched.

4. SUFCo will perform maintenance on the road in a timely fashion to repair any sluff or erosion related damage.

5. Attached hereto is a report prepared by Dames & Moore with pertinent soils parameters and road geometry to demonstrate stability.

Violation No. 2 of 2

Nature of Violation

Failure to segregate stockpile and protect topsoil from wind, water erosion or contaminents in an approved manner.

Portion of the Operation to Which Notice Applies

1. In-place topsoil covered by construction of access road to sediment pond.

2. Topsoil stockpile location.

Remedial Action Required (Including Interim Steps, If Any)

1. Reseed side cast material and downslopes below access road.

2. Request approval for topsoil stockpile location. Include specifications for protection of stockpile. Request to Division of Oil, Gas and Mining and Office of Surface Mining.

Actions Taken by Southern Utah Fuel Company

1. Side cast material and downslope below access road have been reseeded and hydromulched.

2. Figure 1 shows the proposed topsoil stockpile location. The stockpile will be protected from runoff by establishing drainage ditches around the stockpile. The toe of the stockpile will be stabilized with a silt fence. The stockpile will be seeded. The stream will be channeled away from the stockpile area. A sign will be placed on the stockpile designating the material as topsoil.

We hope the above proposals will satisfy the abatement requirements. If you should have any questions, please telephone either myself at (801) 566-7111, or Mr. Kerry Frame at (801) 637-4880.

Sincerely,

Allon C. Owen

Allon C. Owen, P.E.

ACO/jc

Attachments

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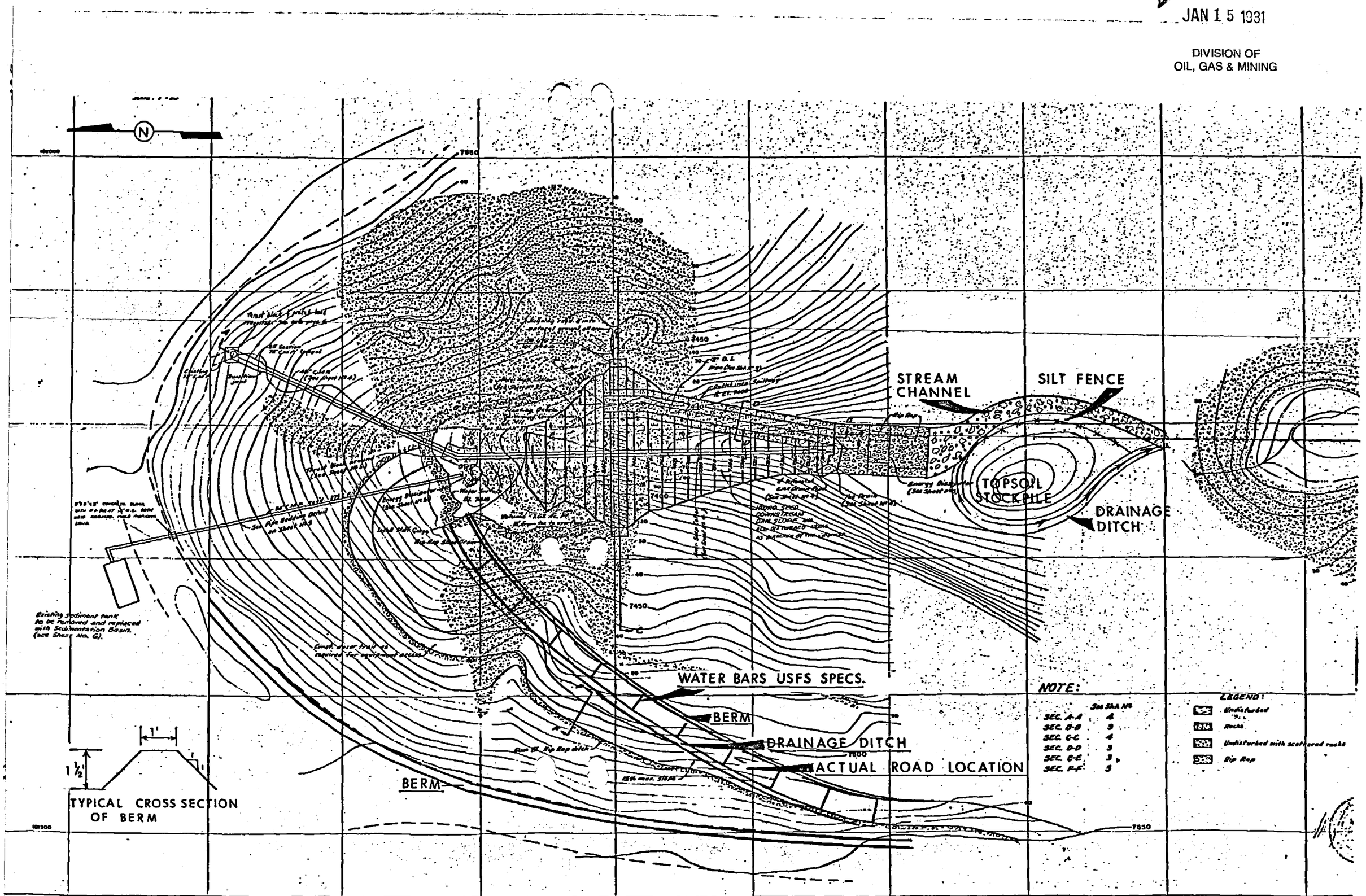
JAN 1 5 1991
DIVISION OF
OIL, GAS & MINING



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