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cc: Ken, Sandy
File/ACT/041/002
Folder #7, Nov File

Subsidiary of Coastal States Energy Company

June 23, 1983

Mr. Joe Helfrich
Division of Oil, Gas and Mining
4241 State Office Building
Salt Lake City, Utah 84114

Dear Joe:

Thank you for the verbal extension of time to abate NOV N83-7-3-1 granted on the telephone yesterday. We believe the extension of the abatement period from 45 days to 90 days is necessary as a result of Ken Wyatt's June 14, 1983 determination that the documents submitted and intended to abate the NOV on April 27, 1983 were inadequate. In that letter, he stated that part one of the required remedial action, compliance with effluent limitations, is being fulfilled. However, the submitted "demonstration that appropriate sediment control facilities are provided by the existing structures for the 10 year, 24 hour precipitation event including operational baseline flow from the shop facility" is what was determined to be inadequate.

The April 27th ACR response committed SUFCo to additional modifications to the sediment control system (i.e., increased standpipe height, decanting devices, and undisturbed area diversions to bypass the facility). These modifications were determined necessary to satisfy the DOGM February 2, 1983 conclusions on page 10, item 3 regarding 10 year, 24 hour precipitation event adequacy. Obviously, as a result of the need to make modifications, we could not demonstrate full adequacy of the existing structures for abatement.

We plan to further address both the violation abatement and the page 10 concerns in the ACR with regard to available storage volume in the sediment pond during the extended abatement period. It appears that the as-built dimensions of the pond are greater than the design dimensions. To confirm this, we will drain the pond, remove the sediment and measure the as-built capacity while making the standpipe modifications. If the pond volume is (or can then be modified to be) in excess of 1.77 acre feet, we can demonstrate sufficient holding capacity to contain all of the 10 year, 24 hour precipitation event without the 50% reduction of required sediment holding volume. (However, we would still need the 0.065 acre foot per acre sediment volume credit provided for in UMC 817.46 (b)(2) and justified by our use of the concrete sediment trap above the pond.)

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Draining, cleaning, and surveying of the pond is anticipated to take between 2 and 3 weeks. We are confident we can accomplish this and submit the additional required abatement documentation within the extended time period. Since the pond will be unusable during the cleaning process, we will notify your office when these operations are to begin and we will sample the decanted water.

Since we received Ken Wyatt's June 14th letter on June 17th, we understand the extended abatement period will expire on August 12, 1983. If either you, Ken Wyatt, or Rick Summers foresee any problems with our additional approach to the abatement, please call.

Yours very truly,
SOUTHERN UTAH FUEL COMPANY

Kerry A. Frame

Kerry A. Frame
Chief Engineer

KAF:dlj

xc: Ken Wyatt, DOGM
Ken Payne, SUFCo