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# State of Utah

DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF OIL, GAS AND MINING

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May 17, 1989

TO: Susan Linner, Permit Supervisor

FROM: Mike DeWeese, Reclamation Hydrologist *MD*

RE: New Subsoil Storage Area, Southern Utah Fuel Company,  
Convulsion Canyon Mine, ACT/041/002-89A, Sevier County, Utah

## SUMMARY:

The operator's submittal received April 22, 1989, proposing to create a subsoil storage area at the waste rock disposal site, has been reviewed regarding hydrologic concerns. This area is to be utilized as temporary storage of excess subsoil material from the new coal storage pad. The submittal is not considered technically adequate at present.

## ANALYSIS:

Submitted map 2 depicts 0.55 acres adjacent to the southwest boundary of the waste rock disposal site, outside the sedimentation pond drainage area, as the proposed subsoil storage site. Division policy defines a Level I Small Area Exemption as "Disturbed areas that cannot reasonably be treated by a siltation structure (i.e. sed. pond) due to remote geographic locations...". Therefore due to the close proximity of the sedimentation pond the proposed location of the storage area is not considered acceptable. The operator must locate the subsoil storage site such that surface runoff will report to either the existing sedimentation pond or the catch basin below the pond outlet.

The operator's cover letter states that alternate sediment control measures such as silt fences, straw bales, or other sediment control devices will be employed to treat surface runoff from the subsoil stockpile. Map 2 must be revised to depict the location and extent of the sediment control measures to be implemented on the subsoil stockpile and also depict the existing sediment fences below the topsoil stockpiles.

## RECOMMENDATIONS:

The Division recommends that the proposed amendment classifying the subsoil storage area as a small area exemption be denied at this time.

BT98/31