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# STATE OF COLORADO

Roy Romer, Governor

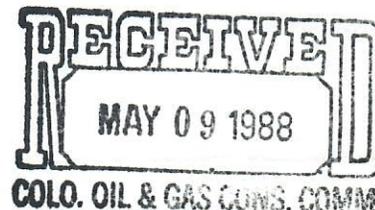


## DEPARTMENT OF NATURAL RESOURCES MINED LAND RECLAMATION DIVISION

FRED R. BANTA, Director

May 3, 1988

Mr. McKee  
Oil and Gas Conservation Division  
1580 Logan Street  
Denver, Colorado 80203



SUBJECT: Sun Coal Company, Meadows Mine, C-81-029  
Eilts Well, T6N, R87W, SE1/4 SE1/4, Section 23  
Routt County, Colorado

Dear Mr. McKee:

On April 28, 1988, I performed an inspection at the Meadows Mine operated by Sun Coal Company at the request of the landowner, Mr. John Eilts. Mr. Eilts contended that drainage from an adjacent coal haul road had flooded out the primary pit adjacent to his oil pump. This resulted in a 3' x 100' flow of oil down the slope towards a stockpond. Although this oil stopped short of the pond, additional run-off could result in the contamination of the pond.

My evaluation of the situation indicated that this was an Oil and Gas Commission problem located within a coal permit area. Consequently, I asked Susan Mowry of our office to call you on April 28, 1988, to request an inspection by your agency. Haul road drainage influences drainage at this site only marginally; it may in fact diminish the amount of water which needs to be drained along the access road by limiting the size of the watershed.

It appeared to me that the access road ditches should be enlarged to handle a 2-year, 24-hour event and that the oil spilled at the site should be disposed of in an environmentally-sound manner. Furthermore, it would seem that the open, primary pit could be replaced by a closed tank.

I have enclosed a copy of my inspection report. Please let me know if you have any questions.

Sincerely,

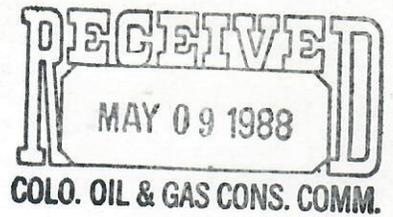
Catherine W. Begej  
Reclamation Specialist

CWB/scg

Enclosure(s)

7093F

COLORADO MINED LAND RECLAMATION DIVISION  
COAL INSPECTION REPORT



Mine Name: MEADOWS MINE  
Operator: SUN COAL CO  
Permittee: SAME  
County: ROUW  
Type of Operation: SURFACE, PRIVATE

[C] MINE ID # OR EXPLORATION ID #..... C - 81 - 029 -  
PFID1 PFID2 PFID3 CL-ID

[C] INSPECTION DATE..... 04/27/88 thru 04/29/88

[C] INSPECTOR'S INITIALS..... CWB [S: WANG User ID - Use Initials with no punctuation marks or spaces]

[C] TIME OF DAY (MILITARY TIME)... 16:30

[C] INSPECTION TYPE CODE..... CP [CL-IN: CC=Coal - Complete, CP=Coal - Partial, CX=Coal Exploration, IL=Illegal Operation]

POST INSPECTION CONTACTS..... OR [CL-AG: NO=None, BL=U.S. BLM, CE=U.S. Corps. of Engineers, CH=Colo. Health Dept., CL=Colo. Land Board, CT=Citizen, CW=Colo. Wildlife, DE=U.S. Energy, DW=U.S. Wildlife, FS=U.S. Forest Service, HW=Colo. Highway Dept., OS=OSM, SE=State Engr. (Water Resources), OR=Other]  
*Oil & Gas Commission*

JOINT INSPECTION AGENCY CODE.. NO

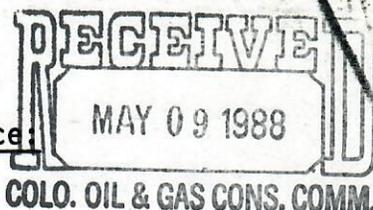
[C] REASON FOR INSPECTION CODE.... CT [CL-RS: AG=Other Agency Request, CT=Citizen Complaint, FU=OSM 10 Day Notice Follow-up, IE=Normal I&E Program, MU=Memo Of Understanding, OR=Other, SI=Surety-Related]

CO. REP. PRESENT.. BRIAN ARCHER [20 Spaces Max]

CO. REP. SIGNATURE (FIELD ISSUANCE ONLY) Brian Archer 4-28-88  
(DATE)

[C] WEATHER CODE..... CR [CL-WE: CL=Cloudy, CR=Clear, RN=Raining, SN=Snowing, WD=Windy, OR=Other]

NOTE: [C] = Required Entry.



For The Following Entries, Circle The Appropriate Choice:

- Y = Inspected and found in compliance,
- NA = Inspection Topic not applicable,
- N = Not Inspected,
- R = Inspected and Comments noted,
- V = Inspected and Violations (NOV) or Cessation Order (CO) issued,
- B = Inspected and both Comments noted & Violations or Cessation Order issued,
- T = 10 Day Notice Issued by OSM Oversight Personnel,
- S = Sample taken and sent to the lab from analysis - describe type and location of sample taken under comment section.

GENERAL INSPECTION TOPICS:

- [C] AVAILABILITY OF RECORDS..... [ Y / NA / (N) / R / V / B / T / S ]
- [C] SIGNS AND MARKERS..... (Y) / NA / N / R / V / B / T / S ]
- [C] ROADS..... [ Y / NA / N (R) / V / B / T / S ]
- [C] HYDROLOGIC BALANCE..... [ Y / NA / N (R) / V / B / T / S ]
- [C] BACKFILL & GRADING..... [ Y / NA / N (R) / V / B / T / S ]
- [C] EXPLOSIVES..... [ Y / NA / (N) / R / V / B / T / S ]
- [C] PROCESSING WASTES..... [ Y (NA) / N / R / V / B / T / S ]
- [C] SUPPORT FACILITIES..... (Y) / NA / N / R / V / B / T / S ]
- [C] TOPSOIL..... (Y) / NA / N / R / V / B / T / S ]
- [C] GENERAL MINE PLAN COMPLIANCE..... (Y) / NA / N / R / V / B / T / S ]
- [C] FISH & WILDLIFE..... [ Y / NA / N (R) / V / B / T / S ]
- [C] REVEGETATION..... [ Y / NA / N (R) / V / B / T / S ]
- [C] AIR RESOURCE PROTECTION..... (Y) / NA / N / R / V / B / T / S ]
- [C] SLIDES & DAMAGE..... [ Y (NA) / N / R / V / B / T / S ]
- [C] SUBSIDENCE..... [ Y (NA) / N / R / V / B / T / S ]
- [C] EXCESS SPOIL & DEVELOPMENT WASTE.. [ Y / NA / (N) / R / V / B / T / S ]
- [C] OFFSITE SUPPORT FACILITIES..... [ Y (NA) / N / R / V / B / T / S ]
- [C] RECLAMATION SUCCESS..... [ Y / NA / (N) / R / V / B / T / S ]
- [C] SPECIAL CATEGORIES OF MINING..... [ Y / NA / (N) / R / V / B / T / S ]

(1) \_\_\_\_\_ [20  
 (2) \_\_\_\_\_ Spaces  
 (3) \_\_\_\_\_ Max]

[C] OTHERS..... [ Y / NA / N / R / V / B / T ]

(1) \_\_\_\_\_ [20  
 (2) \_\_\_\_\_ Spaces  
 (3) \_\_\_\_\_ Max]

NOTE: [C] = Required Entry.

### III. Comments - Compliance

Below are comments on the inspection. The comments include discussion of observations made during the inspection. Comments also describe any enforcement actions taken during the inspection and the facts or evidence supporting the enforcement action.

On April 27, 1988, Cathy Begey and Tim King visited the Meadows Mine to investigate a complaint about haul road drainage (subject of NOV C-87-46, currently scheduled to be abated by July 29, 1988). The main haul road was in good condition - damp, but in a condition that one would consider dry at this time of year. The road accessing an oil rig at the far south end of the road, south of the reclaimed area, had a small rivulet of water running down its length, as well as a damp spot which seemed spring-fed. Conditions were documented with a camera.

On April 28, we returned to the site, accompanied by Karen Hellner + Brian Archer to observe a leaking primary pond found in conjunction with an oil rig located in the SE 1/4 SE 1/4 of section 23 and is owned and operated by ~~John~~ <sup>JOHN</sup> Elts (the Elts ~~well~~ well). This well is accessed by a short road (1/4 mile) west of the haul road. Two small ditches drain the <sup>access</sup> road. One comes across the south end of the drilling platform, bypassing the primary pond to the south. The drilling platform was wet, the 15' x 35' x 1/2' primary pond was full of water covered by a thick oily scum, and the pond appeared to have discharged in a 3' wide x 100' long flow down the hill into the oakbrush. This situation should be taken care of by the responsible party: the access road drainage ditches should be made bigger and the oil contaminated soil should be shoveled into barrels - properly disposed of. The Oil & Gas Commission has been informed.

The reclaimed area was greening up. Small rills covered the west-facing slope. Five porcupines were observed on the reclaim or in the oakbrush adjacent to the reclaim.

While at the mine, John Elts, the land owner, complained that the <sup>haul road</sup> water bars were destructive to both the watershed and the animals in the area. He felt that a crowned road would disperse the water better throughout the watershed and would not form deep ditches. Mr Elts contends that animals have gotten trapped in the ditches and have been either injured or killed.

#### IV. Enforcement Actions

The following identifies enforcement actions taken during this inspection, the required abatement and date of abatement for the violation, previous violations still requiring abatement and the termination of violations cited during previous inspections.

NOV. <sup>87-046</sup> ~~87-046~~ is still outstanding. Brian Archer has been in the area contracting with local operators to take care of this violation. Contractors are scheduled to start work on Monday May 2, 1988.

NOTE: Attach appropriate VIOLATIONS OR CESSATION ORDER CODING FORMS

Revised: May 21, 1985

Doc. No. 8101

4-28-88

Aman Mory

866-3567

Mixed Land Res.

Bear River

SW NE 14-6N-87W

John Eilts

The following identifies enforcement a  
required statement... date of absence  
still requiring statement and the form  
inspections.  
57-014  
is still out of  
the area contracting with the  
Victorian Contractor and  
Meeting May 5, 1988

Spoke to KT-B  
TUESDAY 4/10/88  
wrt Problem. Will  
TRY TO VISIT.

RV

ATION ORDER CODING FORMS

CLORADO  
ATION COMMISSION  
RURAL RESOURCES  
OWER BUILDING  
STREET  
RADD 80208  
-2231