

NOV 6 1990

URFO:GRK
Docket No. 40-8902
04008902390E

ARCO Coal Company
Bluewater Mill
ATTN: Ron S. Ziegler
P.O. Box 638
Grants, New Mexico 87020

Gentlemen:

Our office is in receipt of your application for alternate concentration limits (ACLs) submitted by cover letter dated June 20, 1990. Considerable progress has been made towards a final ACL guidance document; meanwhile, our review of your application is proceeding.

Our preliminary review of the ACL application indicates that there are two areas where modifications may be necessary. Our calculations indicate that approximately 4,254 acres of land will be deeded to the Federal or State government for long-term care. A review of your proposed reclamation plan indicates that less than 600 acres of this land mass represents byproduct material disposal areas or land that is necessary to ensure stability of these components. It appears that only approximately 25 percent of the 4,254 acres is necessary to ensure isolation of long-term stability features as well as their access. In consideration of this situation, please redefine a reduced land area that will be transferred to the Federal or State government.

With regard to your points of exposure, the Simpson and Roundy No. 23 wells are located some distance from that land area that is considered the minimum amount necessary to ensure long-term stability. We understand that you have researched future development of the site and that you consider the potential for development near the reclaimed site to be remote. This may be the case; however, at this time it cannot be assured. Accordingly, please propose alternate points of exposure adjacent to the minimum amount of land needed to assure long-term stability.

PM: URFO *GRK*
GKonwinski/lv
11/5/90

GRK
PM: URFO
PGarcia
11/5/90

EPH
DD: URFO
EHawkins
11/5/90

EPH
D: URFO: RIV
REHall
11/6/90

9011140306 901106
PDR ADOCK 04008902
C PDC

11/5/90

EPH
11/6

NOV 6 1990

ARCO Coal Company

2

Should you have any questions concerning the review of this submittal, please contact Gary Konwinski of my staff.

Sincerely,

Original Signed By:
R. E. HALL

Ramon E. Hall
Director

bcc:
PDR/DCS
URFO r/f
ABBeach, RIV
LLO Branch, LLWM
GKonwinski
PGarcia
RCPD, NM
EID, NM