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State of Utah  
DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF OIL, GAS AND MINING

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August 23, 2001

Johnny Pappas, Sr. Environmental Engineer  
Castle Gate Holding Company  
847 Northwest Highway 191  
Helper, Utah 84526

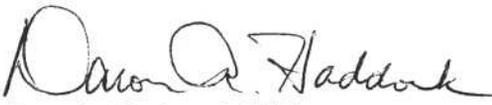
Re: Transfer of Power Lines from the Castle Gate Permit to the Willow Creek Permit, Castle Gate Holding Company, Castle Gate Mine, C/007/004-AM01E, Outgoing File

Dear Mr. Pappas:

The above-referenced amendment has been reviewed. There are deficiencies that must be adequately addressed prior to approval. A copy of our Technical Analysis is enclosed for your information. In order for us to continue to process your application, please respond to these deficiencies by November 24, 2001.

If you have any questions, please call me at (801) 538-5268 or Karl R. Houskeeper at (435) 613-5330.

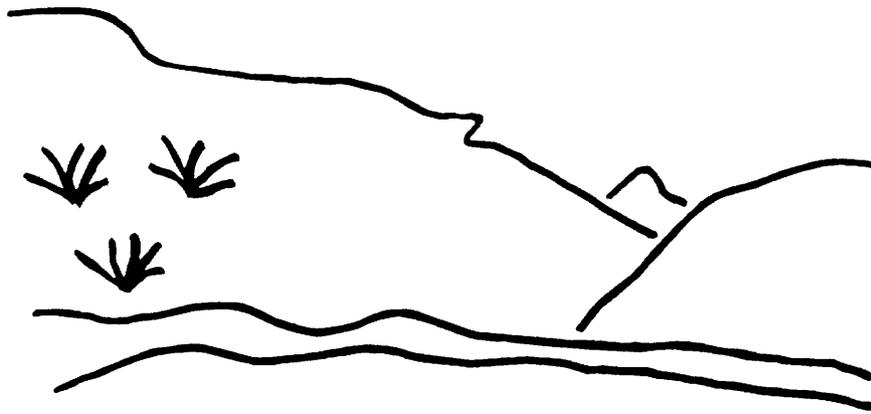
Sincerely,

*for*  
  
Pamela Grubaugh-Littig  
Permit Supervisor

Enclosure

cc: Price Field Office  
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# State of Utah



## Utah Oil Gas and Mining

### Coal Regulatory Program

Castle Gate Mine  
Transfer of Power Lines  
C/007/004-AM01E  
Technical Analysis  
August 21, 2001

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INTRODUCTION

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## TECHNICAL ANALYSIS

### INTRODUCTION

On August 20, 2001, the Division reviewed the amendment (AM01E) submitted by Castle Gate Holding Company relative to the Transfer of Power Lines from the Castle Gate Permit to the Willow Creek Permit. The amendment material submitted contains clarifications of the proposed power line transfer and reclamation of the substations at Sowbelly Canyon and Hardscrabble Canyon.

This amendment was submitted in conjunction with amendment (AM01D) that is addressed separately. Amendment (AM01D) adds the Power Lines into the Willow Creek Permit.

The information submitted relative to this amendment (AM01E) in context appears to be all right; however, in a side-by-side comparison of the pages to be replaced several text carry-over problems from page to page exist. In addition, the surface facilities maps should be revised to indicate the removal of the substations and the transfer of the power lines to Willow Creek.

**INTRODUCTION**

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SUMMARY OF OUTSTANDING DEFICIENCIES

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## SUMMARY OF DEFICIENCIES

*The Technical Analysis of the proposed permit changes cannot be completed at this time. Additional information is requested of the permittee to address deficiencies in the proposal. A summary of deficiencies is provided below. Additional comments and concerns may also be found within the analysis and findings made in this Draft Technical Analysis. Upon finalization of this review, any deficiencies will be evaluated for compliance with the regulatory requirements. Such deficiencies may be conditioned to the requirements of the permit issued by the Division, result in denial of the proposed permit changes, or may result in other executive or enforcement action as deemed necessary by the Division at that time to achieve compliance with the Utah Coal Regulatory Program.*

*Accordingly, the permittee must address those deficiencies as found within this Draft Technical Analysis and provide the following, prior to approval, in accordance with the requirements of:*

### *Regulations*

**R645-301-121.100**, Page 3.2-1, 2<sup>nd</sup> paragraph, 1<sup>st</sup> sentence should be deleted. Page 3.2-1 is also missing text at the bottom of the page. This information should be included on this page or an additional page submitted to include this information. Page 3.2-20 is missing text at the bottom of the page. This information should be included on this page or an additional page submitted to include this information. Page 3.3-30 is missing text at the bottom of the page. This information should be included on this page or an additional page submitted to include this information. Page 3.3-40 is missing text at the bottom of the page. This information should be included on this page or an additional page submitted to include this information... 6

**R645-301-512.120 & R645-301-521.122**, Exhibit 3.2-1, Surface Facilities map for Sowbelly Canyon, should be modified to indicate that the substation has been removed and that the Power Lines have transferred to Willow Creek (C/007/038). Exhibit 3.3-1, Surface Facilities map for Hardscrabble Canyon, should be modified to indicate that the substation has been removed and that the Power Lines have transferred to Willow Creek (C/007/038). Exhibit 3-22 Affected Surface Areas and Utilities map should be modified to indicate the transfer of the Power Lines to Willow Creek (C/007/038). ..... 8

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August 21, 2001

**SUMMARY OF OUTSTANDING DEFICIENCIES**

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## GENERAL CONTENTS

### PERMIT APPLICATION FORMAT AND CONTENTS

Regulatory Reference: 30 CFR 777.11; R645-301-120.

#### Analysis:

Page 3.2-1, 2<sup>nd</sup> paragraph, 1<sup>st</sup> sentence, "...except that the substation still remains." should be deleted. This statement conflicts with the next sentence that states, "The substation was reclaimed in the Fall 2001."

Page 3.2-1 is missing text at the bottom of the page, "...materials derived from the cut. The resultant cut in the valley wall is an...". This is a result of a carry-over problem.

Page 3.2-11 is ok.

Page 3.2-20 is missing text at the bottom of the page, "...facilities shown on Exhibit 3.2-1. Therefore, the requirements of R645-103-100 are applicable to Sowbelly Canyon.". This is a result of a carry-over problem.

Page 3.3-27 is ok.

Page 3.3-30 is missing text at the bottom of the page, "...lane road width...". This is a carry-over problem.

Page 3.3-40 is missing text at the bottom of the page. "Limited spoil material is available in Hardscrabble Canyon for several reasons. When the highwalls were cut in the 1960's, most of this material was pushed onto the side slopes of the...". This is a carry-over problem.

#### Findings:

Information provided in the proposed amendment is not considered adequate to meet the requirement of the section. Prior to approval, the permittee must provide the following in accordance with:

**R645-301-121.100**, Page 3.2-1, 2<sup>nd</sup> paragraph, 1<sup>st</sup> sentence should be deleted. Page 3.2-1 is also missing text at the bottom of the page. This information should be included on this page or an additional page submitted to include this information. Page 3.2-20 is missing text at the bottom of the page. This information should be included on this page or an additional page submitted to include this information.

**GENERAL CONTENTS**

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Page 3.3-30 is missing text at the bottom of the page. This information should be included on this page or an additional page submitted to include this information.  
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ENVIRONMENTAL RESOURCE INFORMATION

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## ENVIRONMENTAL RESOURCE INFORMATION

Regulatory Reference: Pub. L 95-87 Sections 507(b), 508(a), and 516(b); 30 CFR 783., et. al.

### MAPS, PLANS, AND CROSS SECTIONS OF RESOURCE INFORMATION

Regulatory Reference: 30 CFR 783.24, 783.25; R645-301-323, -301-411, -301-521, -301-622, -301-722, -301-731.

Minimum Regulatory Requirements:

The permit application must include as part of the Resource Information, the following maps, plans and cross sections:

Existing structures and facilities maps

Location and dimensions of existing areas of spoil, waste, coal development waste, and noncoal waste disposal, dams, embankments, other impoundments, and water treatment and air pollution control facilities within the proposed permit area.

#### Analysis:

##### Existing Structures and Facilities Maps

Exhibit 3.2-1 Surface Facilities map for Sowbelly Canyon should indicate that the substation has been removed and that the Power Lines have transferred to Willow Creek (C/007/038).

Exhibit 3.3-1 Surface Facilities map for Hardscrabble Canyon should indicate that the substation has been removed and that the Power Lines have transferred to Willow Creek (C/007/038).

Exhibit 3-22 Affected Surface Areas and Utilities map should indicate the transfer of the Power Lines to Willow Creek (C/007/038).

#### Findings:

Information provided in the proposed amendment is not considered adequate to meet the requirement of the section. Prior to approval, the permittee must provide the following in accordance with:

**R645-301-512.120 & R645-301-521.122**, Exhibit 3.2-1, Surface Facilities map for Sowbelly Canyon, should be modified to indicate that the substation has been removed and that the Power Lines have transferred to Willow Creek (C/007/038). Exhibit 3.3-1, Surface Facilities map for Hardscrabble Canyon, should be modified to indicate that the substation has been removed and that the Power Lines have transferred to Willow Creek (C/007/038). Exhibit 3-22 Affected

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**ENVIRONMENTAL RESOURCE INFORMATION**

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Surface Areas and Utilities map should be modified to indicate the transfer of the Power Lines to Willow Creek (C/007/038).

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