



007/005 #2

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DIVISION OF  
OIL GAS & MINING

0057

June 15, 1992

Daron Haddock, Permit Supervisor  
Division of Oil, Gas, and Mining  
355 West North Temple  
3 Triad Center, Suite 350  
Salt Lake City, Utah 84180-1203

Dear Mr. Haddock:

**SUBJECT: OVERLAND CONVEYOR DEFICIENCIES**

We have reviewed the Division's May 29, 1992, letter, which outlined the deficiencies for the overland conveyor revision, and have the following responses:

**Deficiencies (P. Burton)**

1. Prior to creating new disturbance, the applicant must submit an updated Table of Contents for Volume A-2.

**Response:** Table of Contents for Volume A-2 has been revised.

2. Prior to creating new disturbance, the applicant must remove inaccurate statements from page 3-24 of the MRP.

**Response:** We have revised page 3-24.

3. Prior to creating new disturbance, the applicant must clarify the term "intervisible" buffer zone on page 3-42 of the MRP; indicate on page 4-36 of the MRP that annual evaluations were conducted from 1980 to 1985, and make the necessary corrections to the acreage figures listed on page 1-20, page 2-127, and page 3-64G.

**Response:** Webster's Third New International Dictionary, defines "intervisible" as, "mutually visible-surveying stations." This definition describes our usage of the word. Pages 1-20, 2-127, 3-64G and 4-36 have been revised.

4. Prior to creating new disturbance, the applicant must clarify the statements on page 3-64G of the MRP concerning the estimated average disturbance at 11 tower locations of 500 ft<sup>2</sup> and the average disturbance at 5 locations of 660 ft<sup>2</sup>.

**Utah Fuel Company**

A SUBSIDIARY OF THE COASTAL CORPORATION  
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SALT LAKE 801/596-7111

**Response:** Page 3-64G has been revised.

5. Prior to creating new disturbance, the applicant must expand the spill clean-up plan to include any accumulations of greater than 2 inches of coal fines within the permitted area of the conveyor.

**Response:** Page 3-20B has been revised.

6. Prior to creating new disturbance, the applicant must revise the soils and vegetation sheets to include all the types of information that are set forth on U.S. Geological Survey of the 1:24,000 scale series.

**Response:** Soils and vegetation maps have been revised.

7. Prior to creating new disturbance, the applicant must provide the disturbed area boundary and permit area boundary on the soils and vegetation map sheets and on the surface facilities maps; site the locations of the SCS Practice and Trial Experimental areas for the conveyor on the soils and vegetation map sheets as per R645-301-521.190.

**Response:** Disturbed area boundaries have been included on the vegetation and soils maps. However, due to different scales, these boundaries are only approximations. Accurate boundaries are shown on Maps 3.2, 3-3 through 3.2.3-3f. Site locations for the SCS practices are also shown on maps 3.2.3-3 through 3.2.3-3D, which were submitted to the Division earlier.

8. Prior to creating new disturbance, provide the map which accompanied the SCS prime farmland determination of Section 2.14.

**Response:** A search of our files has failed to find the map referred to in the SCS letter. However, in talking with Keith Welch (a Coastal employee) who sent the original request letter and map to the SCS, he has indicated that the original request was for basically the portal area, the railroad loadout area as now permitted, and for an overland conveyor corridor which was originally permitted. The present request for permit amendment for the overland conveyor follows the same basic route as that which was originally permitted. It, therefore, seems logical that the SCS determination of no prime farm land included the area proposed for the overland conveyor.

9. Prior to creating new disturbances, the applicant must resolve the discrepancy between vegetation around soil pit #4 and the vegetation map.

**Response:** Table 1, "Soil Analysis of Nine Eccles Canyon Soil Profiles," by Sheldon D. Nelson, Ph.D., has been revised to correspond with the vegetative map.

10. Prior to creating new disturbances, the applicant must provide the slope at each soil pit location.

**Response:** Table 1, "Soil Analysis of Nine Eccles Canyon Soil Profiles," by Sheldon D. Nelson, Ph.D., has been revised to show slopes at each pit location.

11. Prior to creating new disturbances, the applicant must provide field notes that describe pit profiles.

**Response:** Dr. Nelson who conducted our soil sampling is in South America, and, therefore, his field notes are not available. However, Table 1, "Soil Analysis of Nine Eccles Canyon Soil Profiles," by Dr. Nelson does describe the pit profile, and should provide the necessary information.

12. Prior to creating new disturbances, the applicant must indicate depth to bedrock for each site or describe the characteristics of each site which limited pit excavation depth, if rock was not encountered.

**Response:** Table 1, "Soil Analysis of Nine Eccles Canyon Soil Profiles," by Sheldon D. Nelson, Ph.D, has been revised to include this information.

13. Prior to creating new disturbances, the applicant must provide the soil sampling information obtained for development of Trial #3 as described in the SCS Conveyor Bench Reclamation Plan (Vol. A-2 of MRP).

**Response:** Soil test report taken in conjunction with the SCS revegetation plan is attached.

14. Prior to creating new disturbances, the applicant must provide a soil classification according to the standards of the National Cooperative Soil Survey.

15. Prior to creating new disturbances, the applicant must provide soil sample analysis and pit profile descriptions for all soils categorized and mapped.

**Response to 14. & 15.:** We feel that the report by Sheldon D. Nelson, Ph.D., "Soil Characteristics on the Proposed Conveyor Construction Site by Utah Fuel Company in Eccles Canyon," addresses these deficiencies.

16. Prior to creating new disturbances, the applicant must revise Table 2.11-1 to show correct mathematical calculations of the estimated topsoil requirement for the entire site.

**Response:** Tables 2.11-1 and 2.11-2, as well as Topsoil Volumes in the bonding calculations are in error. In addition to mathematical errors, the topsoil which was added to the mine site topsoil pile has not been added into the calculations. Since this same deficiency is also included in the M&RP renewal deficiency letter, we would like to request that we respond to this deficiency in the M&RP response.

17. Prior to approval, the applicant must commit to include in the field testing of reclamation techniques (contemporaneous reclamation), the graded 'spoil muck' which will remain on the cut slopes of the conveyor bench and commit to covering this spoil with topsoil if the evidence gathered during field testing proves that the spoil is not a suitable growth medium.

**Response:** We have already committed to this in previous correspondence to the Division. However, to keep the record and paper trail intact, Utah Fuel Company, "Does commit to covering the graded 'spoil muck' with topsoil, if evidence gathered during field testing proves that the spoil is not a suitable growth medium."

18. Prior to creating new disturbances, the applicant must provide a statement in the soils chapter 2.11 which defines the amount of topsoil stored in the two topsoil storage locations and demonstrate that adequate cover is available for reclamation cover in the National Forest and private lands given the cover requirements committed to within the plan.

**Response:** This deficiency must be correlated with deficiency No. 16, therefore, we are requesting that the response be addressed in the deficiency response to the M&RP renewal.

19. Prior to creating new disturbance, the applicant must estimate the quantity of topsoil to be salvaged from the lower canyon areas. Please see deficiencies #1 and 2 under R645-301-232 below.

**Response:** The overland conveyor construction plan has been revised, and now includes this information. A copy is attached.

20. Prior to creating new disturbances, the applicant must estimate the depth of topsoil salvage from the 5 tower locations in the Eccles Creek crossing and the 11 towers along the lower conveyor bench; include this estimated topsoil salvage depth in the "Construction Plan," and provide this information to the contractor prior to the start of construction.

**Response:** The overland conveyor construction plan has been revised, and now includes this information. A copy is attached.

21. Prior to creating new disturbances, the applicant must update page 3-35A of the MRP to state that topsoil was salvaged from the tower disturbances on the lower portion of the conveyor route and that topsoil and spoil material from the upper reaches of the conveyor disturbance were salvaged for use as cover at the Scofield Waste Rock Site.

**Response:** Page 3-35A has been revised to include this information.

22. Prior to creating new disturbances, the applicant must commit to updating chapter 2.11 with information on total topsoil and cover material (see discussion above under R645-301-232) salvaged the stored from the construction of the conveyor towers.

**Response:** After all soil material is removed from the construction site, chapter 2.11 will be updated to include the total topsoil and cover material that was salvaged.

23. Prior to creating new disturbances, the applicant must further clarify on page 4-36A what experimental practices will be evaluated for inclusion in the Annual Report and in what years?

**Response:** Page 4-36A has been revised.

### **Deficiencies - P. Baker**

1. The revision must show similarity of vegetative cover, diversity, density, and productivity by life forms between areas to be disturbed on the conveyor route and the reference area standard which will be used for final reclamation. The revision must also document that species present in the communities on the conveyor route are described in other parts of the plan.

**Response:** Endangered Plant, Inc., has done additional vegetative sampling along the actual conveyor route. A copy of their report is attached.

2. Animal unit month or animal unit figures shown in Table 2.12.2-1 must be checked and corrected.

**Response:** Table 2.12, 2-1, page 2-123 has been revised.

### **Deficiencies - R. Summers**

1. Prior to August 1, 1992, the application must be revised to include a plan and specific measures to be used to contain residual coal spilled during periods of snow cover within the disturbed area. The plan must also provide measures to be used to provide secondary treatment of runoff (in addition to operational alternative sediment control measures) from these areas until final spill removal can be accomplished.

**Response:** Page 3-20C has been revised to address this deficiency.

2. Prior to June 15, 1992, the application must be revised to state specifically the tower locations (with tower identification labels) to be installed in the vicinity of stream channels and drainages. The application should state specifically the distance from channel center to tower disturbance in feet.

**Response:** Map 3.2.3-2D shows the tower locations in the vicinity of Eccles Creek. Map 3.2.3-2D has also been revised to show the slope distance from each tower to center line of Eccles Creek.

3. Prior to initiation of construction, the application must be revised to include a plan to monitor Eccles Creek during periods of construction activity. The plan should include monitoring of total suspended solids, settleable solids and turbidity upstream and downstream from all disturbances. The plan should propose a schedule for the monitoring, analysis, and submittal of reports to the Division. The plan should also commit to maintaining monitoring records at the site to be available for inspection.

**Response:** The overland conveyor construction plan has been revised to include this information. A copy of the plan is attached.

4. Prior to commencement of construction activity in the Eccles Creek Buffer Zone at the loadout area, the application must be revised to depict the tower locations and disturbed area on Map 3.2.1-3. The stream buffer zone for this area should also be depicted and labeled on that same Map. The narrative must be revised within the construction plan to specify sediment control for all areas disturbed in addition to excavations for tower placement (e.g. tower location equipment access).

**Response:** Map 3.2.1-3, and the Overland Conveyor Construction plans have been revised to include this information. Copies of the map and plan are attached.

5. Prior to commencement of construction activity in the Eccles Creek buffer zone at the loadout area, the application must be revised to state specifically the fate of water from the placement of concrete. This is to include, but is not limited to: location of disposal pits, a plan for concrete handling, spill removal, equipment rinsing, and disposal of waters associated with the concrete preparation, placement, and cleanup operations. The plan will provide for protection of all surface waters from contamination from these operations.

sediment control should be discussed for this area. The submittal should commit to installing a berm (including runoff design and size) along the access/pad outslope, installing silt fencing at the potential overflow areas, and installation of erosion matting and revegetation methods for the area drainage that will not be treated in the existing sedimentation pond.

**Response:** Pages 3-64E, 3-64F, and Map 3.2 3-2C have been revised to include the necessary information.

10. Prior to August 1, 1992, the application should be revised to present correct calculations for the design of DD-12 and clarify the assumptions used in the design. The calculations should be based upon the as-built configuration of the diversion if field modification of the design if necessary. The operator must contact the Division prior to this date to discuss the specifics of the design inadequacies.

**Response:** Corrections are attached to be inserted into Volume 5, Section 6, as replacement pages for 14 through 18.

We are attaching 14 copies of the following information: pages 1-20, 2-127, 3-20B, 3-20C, 3-24, 3-35A, 3-64E, 3-64F, 3-64G, 3-64I, 3-64I(a), 3-64I(b), 3-67, 4-36, 4-36A, Maps 3.2.1-3, 3.2.3-2D, 3.2.3-2c, Consultant soils maps sheets 1 & 2, consultant vegetative maps sheets 1 and 2, consultant soils report, consultant Vegetative Report, Engineer Calculations pages 14 and 15 (to be inserted in Sec. 6, Vol. 5), and a new table of contents page for Vol. A-2. We have also attached four copies of the, "Skyline Mine Overland Conveyor Construction Plan," and the SCS soil test report.

We feel this information addresses all the deficiencies and concerns raised by your technical staff. We would appreciate an expedient review, and a prompt approval. If there are any items that may hold up approval of this amendment, call Keith Zobell, Ken May, or myself, immediately, as we anticipate the current construction activities to reach the end of the current permitted conveyor bench by 6-22-92.

The information in this request for permit amendment is true, and correct based on our best information and knowledge.

Sincerely,

*Lorraine B. Larsen*

*Glen A. Zumwalt*  
Glen A. Zumwalt  
Vice President/General

Keith Zobell:gb

Attachments

