



# State of Utah

DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF OIL, GAS AND MINING

Norman H. Bangerter  
Governor  
Dee C. Hansen  
Executive Director  
Dianne R. Nielson, Ph.D.  
Division Director

355 West North Temple  
3 Triad Center, Suite 350  
Salt Lake City, Utah 84180-1203  
801-538-5340

0061

August 6, 1992

Mr. Glen A. Zumwalt  
Utah Fuel Company  
P.O. Box 719  
Helper, Utah 84526

Dear Mr. Zumwalt:

Re: Extension, Deficiency response to Five Year Permit Renewal, Coastal States Energy Company, Skyline Mine, ACT/007/005, Folder #3, Carbon County, Utah

The Division has reviewed your written request for an extension of time to respond to Division Order #92C (Permit Renewal Deficiencies). The September 30, 1992 reply date is considered appropriate and an extension is hereby granted to that date. Please make every effort to meet this new deadline.

Enclosed you will also find the results of an administrative review of your initial comments on the permit renewal as was requested in our meeting of July 8th, 1992. As you will note some deficiency items have been dropped while others still remain. Hopefully all deficiencies will have been adequately addressed by September 30th.

Please call if you have any questions.

Sincerely,

Daron R. Haddock  
Permit Supervisor

Enclosures

cc: P. Burton  
PFO  
L. Braxton  
J. Helfrich  
SKYLDEFI.EXT

**ADMINISTRATIVE REVIEW OF SKYLINE'S INITIAL RESPONSE**  
to  
**TECHNICAL DEFICIENCY REVIEW**  
**FOR 1992 PERMIT RENEWAL**

This document responds to the initial comments made by Skyline on the 1992 permit renewal technical deficiency review. The reader should follow along with those comments in order to keep this review in context. Any of Skyline's comments not listed below are considered to be appropriate responses and should be followed through as outlined in the Skyline comment letter.

R645-301-221 Prime Farmland Investigation

1. In the July 8th, 1992 meeting Skyline agreed to submit a description of the area shown on the map in question.

R645-301-222 Soil Survey

1. Again Skyline agreed to submit a better map. DOGM understands that since coordinates are not state plane coordinates the map may not be 100% accurate.
2. Information here is past history. The area is already disturbed. This deficiency is dropped.
3. In light of the new disturbance proposed at the waste rock site a soils map is in order.
5. Information here is past history. Previously approved maps should be adequate. The deficiency is dropped.

R645-301-231.400 Narrative

2. If these analyses are available they would be good to have but they are not required unless the material is substitute topsoil.
3. This deficiency is dropped.

R645-301-240 Reclamation Plan

R645-301-242 Soil Redistribution

2. Soil distribution plans which show uniform thickness are necessary. Perhaps additional maps are warranted.
3. Ripping is not required "per se" by the regulations, however you must provide a method to prevent slippage and promote root growth. Using the term "suitable" is acceptable.

R645-301-321 Vegetation Information

1. Perhaps a summary is not required but Skyline must provide a description of productivity adequate to predict the potential for reestablishing vegetation. This is required by regulation.

R645-301-322 Wildlife Information

1. DOGM agrees with the response.
4. DOGM agrees with the response.
5. DOGM agrees with the response. References should not be deleted.
6. DOGM agrees with the response. However, recent surveys should be reviewed to determine any affects of mining.

R645-301-330 Operational Plan

1. This is a Forest Service, DWR, and DOGM issue and needs to be done. Mitigation of wildlife issues is certainly within the scope of R645-301-330 and it is the Applicants responsibility to provide mitigation measures. Efforts in this area must be correlated through the Division.

R645-301-341.210 Species and Quantities of Seeds and Seedlings

1. "Methods" are not required. This deficiency is dropped.

645-301-341.220 Planting and Seeding Methods

2. Again "method" not required. This deficiency is dropped as long as there is a commitment to prepare the seedbed prior to planting.

R645-301-341.300 Revegetation Feasibility Demonstration

1. Applicant must demonstrate that reclamation is feasible. Thus far, field trials have not shown this.
2. Again plan must demonstrate reclamation feasibility. If conveyor bench is to be left, test plots must demonstrate reclaimability.

3. Not required. This deficiency is dropped.

R645-301-342 Fish and Wildlife

1. DOGM agrees with response.

R645-301-412 Reclamation Plan

4. This deficiency is dropped.
5. Not a renewal issue. This deficiency is dropped.
6. Not a renewal issue. This deficiency is dropped.
7. Not a renewal issue. This deficiency is dropped.

R645-301-420 Air Quality

1. DOGM agrees with the response.

R645-301-522 Coal Recovery

1. The R2P2 does not need to be in the MRP. However, Skyline's plan must include a detailed description of the measures to be used to maximize the use and conservation of the coal resource.

R645-301-525.100 Subsidence Control Plan

1. The applicant must identify all lands that have the potential for material damage from subsidence. This is "all lands" not just those outside the permit area. All Forest Service lands are renewable resource lands. The subsidence control plan must contain a survey that determines whether or not subsidence could cause material damage or diminution of use.

R645-310-525-110 Description of Mining Methods

1. Roof control plans are not required, but general mining methods are required which show how subsidence will be controlled. Areas of planned subsidence should be outlined. Also areas where Skyline proposes to minimize subsidence will need detailed plans for how this will be accomplished.

R645-301-525.120 Description of Physical Conditions

1. Additional information would be nice but not required. This issue is dropped.

R645-301-525.200 Subsidence Control

1. This deficiency is dropped. However, Skyline should insure that all mining is designed so as to not subside outside the permit area.

R645-301-536 Coal Mine Waste

2. As long as the material at the waste rock site has already been analyzed, no additional analysis is necessary.

R645-301-553 Backfilling and Grading

1. Adequate provisions for root penetration must be made. Unless foundations are broken up to allow for vegetation root penetration 4 feet of cover is considered appropriate.

R645-301-600 Geology

1. This is required. See R645-301-623.200 and R645-301-624.100.
2. This should be easy to do if there has been 10 years of data and only one sample that was Acid forming.
3. This is required only for room and pillar operations.
4. This is required by R645-301-622.100.

R645-301-700 Hydrology

3. A well has been drilled. Data should be provided.
4. This is required by R645-301-722.100. The rules do not differentiate between areas containing surface facilities and areas to be mined. In light of the waste rock expansion, this information needs to be provided. Certainly the areas containing surface facilities only would be simpler to protect.

5. Perhaps an evaluation of the seeps and springs in Burnout Canyon and upper Huntington Canyon would be more appropriate than updating the inventory. Regardless, an update of the Probable Hydrologic Consequences of mining in this area is required.

R645-301-728 PHC Determination

In general the Division agrees with Skyline's responses in this section. We should stress that updating the PHC is an important part of permitting. Available data should be used to draw conclusions and discussed in the PHC.

R645-301-731.200 Water Monitoring

1. The Division agrees that monitoring plans should be formulated on a "site specific" basis. This issue is not a renewal issue and the deficiency is dropped. However, certain parameters are required by regulation and justification must be provided for omitting them. If parameters have been dropped from the approved list during the renewal process, they will need to be justified or reinstated.
4. DOGM agrees with the response, however, the permittee should consider the benefits of this type of sampling once every 5 years to help determine the probable hydrologic consequences of the mining operation.
5. Agreed. Proper abandonment procedure must still be followed.
7. A copy of the NPDES permit is required to demonstrate compliance with R645-301-731.222.2.

R645-302-230 Steep Slope Mining

1. This deficiency is dropped.

R645-302.321 Alluvial Valley Floor Determination

1. This is not a renewal issue and the Division agrees with Skyline's proposed course of action on this issue.