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007/005 #2

Coastal
The Energy People

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DIVISION OF
OIL GAS & MINING

March 17, 1993

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:

Re: Response to Permit Renewal Deficiencies and Division Ord 92-C

We have enclosed 12 complete sets of information as outlined on Table 1. This information is a combination of what we understand is the approved pages, maps, figures, calculations and appendix material as submitted in our deficiency responses. In our January 26, 1993 and March 1, 1993 deficiency responses we submitted fourteen copies of information and this information should be incorporated as needed into this current set of information. Other than a few previously identified issues, this submittal should complete the renewal process.

We have the following responses to deficiencies outlined in our 2/22/93 letter.

1. Wildlife Information -- Paul B.

Deficiencies:

1. The plan must include data from recent Wildlife Resources fisheries surveys.

Response:

A copy of the most recent DWR fishery survey in Eccles Creek is included. This report should be inserted in Appendix Vol A-3.

Deficiencies:

R645-301-341.300 Revegetation Feasibility Demonstration.

1. The Operator must demonstrate that areas of the conveyor bench and associated cut slopes are reclaimable according to the plans presented in the mining and reclamation plan. As an alternative to the current plan, Skyline may consider changing the postmining land use for this area.

Utah Fuel Company
A SUBSIDIARY OF THE COASTAL CORPORATION
P. O. BOX 719 • HELPER UT 84526 • 801/637-7925 • FAX 801/637-7929
SALT LAKE 801/596-7111

R645-301-413 Land Use Reclamation Plan.

1. The right of entry information for the land at the loadout must be updated in the plan in accordance with R645-301-114.100.

2. The plan must include comments concerning the postmining land use from the land owners of the conveyor corridor.

Response:

We will respond to these deficiencies by 5/3/93.

Hydrology - Jim Smith

Deficiency:

1. Plate 2.3.4-2, Plate 2.2.1-2, Figure 2-30B, Figure 2-30C, and Figure 2-30D, which were submitted to satisfy deficiencies to the MRP, are not certified as having been prepared by or under the direction of a qualified registered professional engineer or land surveyor as required by R645-301-512.140 and R645-301-722.

Response:

Certified copies of these plates and figures are attached.

Deficiency:

1. The ground water elevation measured in well 92-91-03MW and used in characterizing the regional ground water system should be shown on Plate 2.2.1-2, the cross section showing geology and hydrology of the waste rock disposal site.

2. The ground water elevation measured in well 92-91-03MW and used in characterizing the regional ground water system should be added to Plate 2.3.4-2, the potentiometric surface map.

Response:

Well 92-91-03MW was drilled in 1992, which was several months after the M&RP was submitted for renewal. Although the consultant preparing the hydrologic section of the renewal had access to data from this well, a complete discussion of this

new well is to be included in the M&RP as a modification after the renewal process is complete. This approach has been approved by Mr. Haddock.

Deficiency:

1. The M7RP does not contain data and arguments to support abandonment o monitoring of the Star Point Aquifer at W22-2-2 and W14-2B, and the Division of Oil, Gas, and Mining has not approved modification of the monitoring plan to omit these points. There are unresolved problems concerning the data that were used in the original determination of the PHC, and also with the idea of abandoning ground water monitoring at W22-2-2 and W14-2B. These problems may not be resolvable within the time from or scope of this permit renewal.

Response:

A discussion of the reasons to abandon the failed wells was included in a response dated February 26, 1993. Discussions on unresolved problems from the original PHC determination are most appropriate for a later date.

Topsoil Handling and Storage Areas - P. Burton.

Deficiencies:

1. Utah Fuel Co. does not have an excess storage of topsoil for their anticipated needs. The footnote is misleading and should be corrected to indicate the need for 42,607 yd^3 of topsoil and cover material on private lands (paragraph 2, page 4-38(d).

2. Table 4.6-4 requires some editing to be meaningful: headings of columns should appear above the intended column and yardage should be reported as three dimensional volumes in the footnote rather than areas.

Response:

Page 4-38D and Table 4.6-4 have been changed to reflect the requested information.

We appreciate your efforts in this renewal endeavor. If you need additional information, call Keith Zobell.

Sincerely,

Keith W. Welch for Glen A. Zumwalt

Keith W. Welch
Environmental Coordinator

KWW:sh
Enc.

TABLE 1

Appendix Vol A-2 Vegetative Section

Prime Farmland Map
Sheets 1 and 2 - Vegetation Map for Overland Conveyor
Sheets 1 and 2 - Soils Map for Overland Conveyor
Endangered Plants Including Soils and Vegetation Write for Overland Conveyor

Appendix Vol a-#

Archeological Reports for Overland Conveyor

M&RP Vol 5 Engineering Calculations

Engineering Calculations for DD-12.

M&RP

Table of Contents Vol 2, Pages 1-13, 1-15, 1-15a, 1-23, 1-23a, 1-24, 1-48, 1-50, 2-4, 2-5, 2-5a, 2-9, 2-9a, 2-10, 2-11, 2-21, 2-21a, 2-22, 2-22a, 2-23, 2-23a, 2-24, 2-24a, 2-25, 2-25a, 2-27, 2-27a, 2-28, 2-28a, 2-29, 2-29a, 2-30, 2-30a, 2-30b, 2-30c, Figures 2-30A, 2-30B, 2-30C, 2-30D, pages 2-30h, 2-30i, 2-30j, 2-30k, 2-30l, 2-30m, 20-30n, 2-33, 2-33a, 2-35, 2-35a, 2-36, 2-37, 2-38, 2-39, 2-39a, 2-39b, 2-39c, 2-39d, 2-39e, 2-39f, 2-39g, 2-39h, 2-39i, 2-39j, 2-39k, 2-39l, 2-39m, 2-39n, 2-39o, 2-39p, 2-39q, 2-39r, 2-39s, 2-39t, 2-39u, 2-39v, 2-39w, 2-39x, 2-39y, 2-42, 2-42a, 2-43, 2-43a, 2-66, 2-66a, 2-71, 2-80, 2-81, 2-82, 2-83, 2-84, 2-84a, 2-84b, 2-85, 2-86, 2-86a, 2-99, 2-99a, 2-101, 2-101a, 2-105, 2-105a, 2-114, 2-115, 2-116, 2-117, 2-120, 2-120a, 2-120b, 2-122, 2-122a, 2-128, 3-7, 3-7a, 3-8, 3-8a, 3-20b, 3-20c, 3-24, 3-24a, 3-24b, 3-25, 3-25a, 3-27, 3-28, 3-28a, 3-30, 3-30a, 3-35a, 3-38, 3-38a, 3-45, 3-56, 3-56a, 3-64f, 3-64g, 3-67, 3-67a, 3-68, 3-68a, 3-69, 3-69a, 3-83, 3-83a, 4-13, 4-14, 4-15, 4-16, 4-17, 4-18, 4-19, 4-20, 4-21, 4-22, 4-23, 4-24, 4-25, 4-26, 4-27, 4-27a, 4-34, 4-34a, 4-35, 4-35a, 4-36, 4-36a, 4-38, 4-38a, 4-38b, 4-38c, 4-38d, 4-39, 4-39a, 4-41, 4-43, 4-44, 4-44a, 4-45, 4-45a, 4-45b, 4-49, 4-58, 4-61, 4-62, 4-62a, 4-74, 4-75, 4-77, 4-79, 4-79a, 4-87, 4-87a, 4-87b, 4-87c, 4-87d, 4=87e, 4-88, 4-88a, Drw No. 4.17.1-1, Pages 4-94, 4-95, 4-95a, 4-97, 4-97a, 4-98, 4-99, 4-103, 4-103a, 4-117, 4-118, 4-118a, 4-122a, 4-122b, 4-122c, 4-122d, 4-122e, 4-122f, 5-1 and P.6 of the Cross Reference.

MAPS: 1.6-1, 2.2.1-2, 2.3.4-2, 2.11-1, 3.1.8-1, 3.1.8-2, 3.2.1-1, 3.2.1-3, 3.2.3-1, 3.2.3-1A, 3.2.3.2A, 3.2.3-2B, 3.2.3.2C, 3.2.3-2D, 3.2.3-3, 3.2.3-3B, 3.2.3-3C, 3.2.3-3D, 3.2.3-3E, 3.2.3-3F, 3.2.3-3G, 3.2.8-2A, 4.4.2-1A, 4.4.2-1C, & 4.4.2-1D.