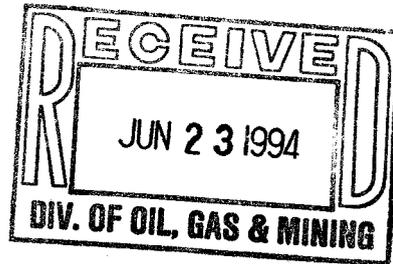




Coastal
The Energy People

June 20, 1994



Utah Coal Regulatory Program
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

Re: Response to Waste Rock Expansion Deficiencies

93H
ACT/007/005 #2
Copy RAM

Dear Mr. Haddock,

The following is our response to your deficiency letter on our application to amend our M&RP to expand the Scofield Waste Rock site.

Where we have made changes to maps and pages in the M&RP, we have enclosed 3 copies of these changes for your review.

- Deficiency:** #93-H JDS 1. Oil and grease is not in the baseline parameters, and total alkalinity and anion/cation balance are not included in baseline and operational parameters in Table 2.3.7-5.
- Response:** Table 2.3.7-5; which applies to well number 92-91-03 only, has been amended to incorporate the recommended changes
- Deficiency:** #93-H JDS 2. The irregular schedule for sampling well 92-91-03 is not explained
- Response:** The entire water quality monitoring schedule at Skyline is largely dictated by weather. The normal snowfall excludes access to most sites from November through May. Well site 92-91-03 is in an area where winter access will not be maintained.

Deficiency: #93-H JDS 3. Plates 2.2.1-2 and 2.3.4-2 do not show ground water elevation that was measured at 92-91-03 and used in characterizing the regional ground water system at the waste rock disposal site.

Response: Ground water elevation data for well 92-91-03 are already shown on Plate 2.2.1-2. Ground water elevation for the same well have been added to Plate 2.3.4-2.

R645-301-765 Permanent Casing and Sealing of Wells

Deficiency: #93-H JDS 4. The commitment to follow the procedures in Section 4.9 to abandon W22-2-2, W14-2B, and the other boreholes used as water level monitoring wells has been omitted from page 2-35 of the submitted amendment and no alternative method of abandoning these wells has been submitted for approval.

Response: The subject of this proposed amendment is the waste rock disposal site and has nothing to do with wells W22-2-2 and W14-2B. Consequently this subject will not be discussed in this response.

Abandonment procedures for these particular wells are being discussed with various state and federal agencies. An abandonment proposal will be submitted to the Division as soon as all issues have been resolved.

R645-300-120 SKF 93-H #1

Deficiency: The operator must provide maps which clearly show the contour lines for all drainage topography on drawings 3.2.8-2, 3.2.8-2A, 4-16.1-1C, 4.16.1-1B and 3.2.8-3. Include a legend describing the dotted lines on 3.3.8-2.

Response: Appropriate maps have been changed to include the required information.

R645-300-120 SKF 93-H #2

Deficiency: The operator must clarify the discrepancy for design location on ditch UD-6 for maps 3.2.8-1 and 3.2.8-2A.

Response: Appropriate maps have been changed to include the required information.

R645-301-533.700 SKF 93-H #3

Deficiency: The operator must provide maps which adequately describe the detail for the pond structure for critical areas, including minimum widths and adjacent channel sections,.

Response: Appropriate maps have been changed to include the required information.

R645-301-711 SKF 93-H #4

Deficiency: Correct the text on pg. 4-82(a) and provide applicable information on the NPDES permit for the Scofield Waste Disposal Site. If the site is not going to discharge and a NPDES permit is not required the information should be provided in the text.

Response: We are requesting from DWQ that the discharge from the Waste Rock Sediment pond be included in our NPDES permit.

R645-301-711 SKF 93-H #4

Deficiency: Correct the text on page 4-82(a) and provide applicable information on the NPDES permit for the Scofield Waste Disposal site. If the site is not going to discharge and a NPDES permit is not required the information should be provided in the text.

Response: We are requesting from DWQ that the discharge from the Waste Rock sediment pond be included in our NPDES permit.

R645-301-728 SKF 93-H #5

Deficiency: The operator's PHC should cross reference the information found in section 4.4 regarding handling of the testing for acid and toxic waste.

Response: The applicants PHC refers to Section 3.2.8 for the guidelines of disposal methods Section 3.2.8 (Pg. 3-57) refers to Section 4.4.5 which specifically deals with acid and toxic-forming materials. We feel there already exists sufficient cross references to meet the regulations. Any additional references would be redundant and would only add to the already existing overload of paper work.

R645-301-731 SKF 93-H #6

Deficiency: Retain the information describing how the requirements of R645-301-731.223 will be met.

Response: For clarity the commitment to submit surface water data has been reinserted on Page 2-45.

R645-301-731-200 SKF 93-H #7

Deficiency: The operator must characterize the quality and quantity of the ground water below the waste rock disposal site. The operator must include the stock watering pond as a water monitoring point since it is the most reliable source for surface water data collection. Additionally, it will be beneficial for demonstrating the pond meets requirements for a permanent structure. Clarify the current use of the stock watering pond.

Response: The characterization of the quality and quantity of ground water below the Waste Rock site is already being done in our quarterly water monitoring reports and on Table 2.3.7-5.

We do not agree with the Division in including the original sediment pond as a water monitoring point. This decision is based on the following facts:

1. Water only appears in the pond after the mine hauls a mixture of snow and gob to the site. Run off from this

mixture runs into the pond. This run off is artificial and is not natural occurring.

2. *After the cattle start grazing the area they and other wildlife animals congregate around the pond. The pond becomes extremely polluted with cattle, deer and elk feces and urine. This results in a green slimy odoriferous growth forming on and in the water. We hardly feel this condition makes it a candidate for routine monitoring.*

The current and planned use of this pond is outlined on Page 3-18(a).

R645-301-732.200 SKF 93-H #8

Deficiency: The operator will need to provide justification for omitting a geotechnical analysis for the embankment created by the construction of the sedimentation pond. Provide an accurate description in the text (Pg. 4-83) and on maps for the minimum embankment which is created by the construction of the pond.

Response: Soil samples have been collected and submitted to a testing laboratory so that a geotechnical analysis can be made for the pond embankment.

The necessary information will be submitted as soon as it is received. Appropriate maps have been changed to include the necessary information. A written description of the pond details is included on Page 3-18a.

R645-301-740 SKF 93-H #9

Deficiency: The operator must provide sediment control measures for the work area and any additional disturbance occurring due to road construction activities.

Response: See Pages 3-64 and 3-71.

R645-301-740 SKF 93-H #10

Deficiency: The operator must provide some type of sediment control measure for the disturbed area above and to the south of DD-17.

Response: We have made some minor adjustments on Drawing 3.2.8-2. ditch DD-17 is to be located on the outside edge of the disturbance and the curve across the slope at approximately the 7885 level so as to intercept any drainage above it.

R645-301-740 SKF 93-H #11

Deficiency: Clarify the function of the existing "Stock Water" sediment pond. Provide a design for the proposed function and clearly show the drainage which reports to the pond.

Response: See page 3-18. After construction only undisturbed drainage will enter the existing sediment pond.

R645-301-742.220 SKF 93-H #12

Deficiency: The operator must provide a short discussion clearly indicating how the requirements for a total containment pond is being met. The operator is referred to CFE Sec. 817.46 (c) 2 (i) through (c) 2 (iii). The information submitted must be certified by a qualified registered engineer. Currently missing criteria include; removing water from the pond in accordance with current prudent, engineering practices (A dewatering plan must be included and be certified by a registered engineer). The operator must provide a certified statement that the pond design meets or exceeds the design precipitation event for the pond based on whether the pond is located where failure would/would not cause loss of life or serious property damage.

Response: The new sediment pond is no longer a total containment pond.

R645-301-742.220 SKF 93-H #13

Deficiency: The operator must propose a prudent method of decanting the proposed waste rock site sediment pond. The operator must

remove the proposal to use water from the total containment pond.

Response: The new sediment pond is no longer a total containment pond.

R645-301-742-300 SKF 93-H #14

Deficiency: The operator must provide a design for the inlet to the sediment pond from ditch DD-17 and DD-16.

Response: The design for the inlets to sediment pond are included in the engineering calculation in Volume 5.

R645-301-742-300 SKF 93-H #15

Deficiency: Clarification on whether UD-3 reports to the sediment pond or to the undisturbed drainage must be made. Additional water determined to be reporting to the new sediment pond must be included in the pond design.

Response: Appropriate maps have been changed to clarify the drainage pattern. Also see Page 3-18.

R645-301-742-300 SKF 93-H #16

Deficiency: The operator must provide a delineation of the watershed area used to determine worst case scenarios for drainage across the lifts. The operator should include drainage reporting from the area above the lift. The map legend required a scale and north arrow.

Response: Appropriate maps have been changed to show the necessary information. See Page 5/6 Sec. 15 of Vol. 5.

R645-301-742-300 SKF 93-H #17

Deficiency: The operator must present design values for Manning's n and channel slopes which are representative of the information presented on maps and in discussion. ditches must be designed using the maximum and minimum slopes unless there is a constant grade. Identify where the upper and lower ditch designs

for DD-16 apply.

Response: The Manning's N value used is based upon open channels, excavated (straight alignment), natural lining (rock, jagged and irregular) which a value range of .040 - .045. We selected .040 as the more conservative number. We fail to see why this is not acceptable.

Page 2-18 of Section 14 Vol. 5 of the original submittal show the upper and lower sections of DD-16.

R645-301-742-300 SKF 93-H #18

Deficiency: Present a valid peak runoff determination for Swale SW-17. The time of concentration can not exceed the duration of the storm.

Response: Peak runoff for SW-17 is included in the engineering calculation Vol.5. Sec. 14 and M3.2.8-3 for area.

R645-301-742-300 SKF 93-H #19

Deficiency: Clarify what ditches are being referred to in text of Pg. 4-39 and 4-3(a).

Response: DD-17 on Page 4-39, part of DD-16 and UD-6 on Page 4-3(a).

R645-301-761 SKF 93-H #20

Deficiency: The operator must clarify conflicting text regarding retention of ponds as permanent impoundments. The operator must demonstrate the applicable regulations for permanent structure retention can be met for the ponds or provide designs for pond reclamation.

Response: See Page 4-78(a).

R645-302 SKF 93-H #21

Deficiency: The operator should provide a summary and reference to

applicable information found in the permit regarding Prime Farmland Determination and AVF for the waste rock area.

Response: We have included a letter from the SCS clarifying this issue.

Deficiency No. 1 - Paul Baker

Skyline needs to determine the amount of subsoil that will be needed to cover the waste rock with 21 inches of material and confirm that enough material is available for this purpose.

Response: Overall, we show that there is 6.29 acres of total disturbance at the waste rock site to be reclaimed. There is available 13,470 yd³ of available subsoil. If all of the subsoil is uniformly applied on the 6.29 acres it will result in a 16 inch layer of subsoil.

Deficiency No. 2 - Paul Baker

It is recommended that potentially acid-forming or toxic materials be special handled and covered with at least four feet of non acid-forming and non-toxic waste and soil. An acceptable alternative would be to conduct field trials to determine if revegetation is feasible using less than four feet of cover over potentially acid-firming or toxic material.

Response: See Pages 4-38 and 4-38(a). The site will be covered with 12" of topsoil plus 16" of subsoil. The remaining 20" of non-toxic, acid-forming material will be gob material. basically, the majority of our gob meets the criteria of non-toxic or acid-forming. This material will be tested and if satisfactory used to achieve the "required" four feet of non-toxic or acid forming material in conjunction with the topsoil and subsoil.

Deficiency No. 3 - Paul Baker

Skyline needs to show that the subsoil material to be salvaged from the site fulfills the need for non-acid-forming and non-toxic cover over the waste.

Response: See Pages 4-38(c) and 4-38(d).

Deficiency No. 1 - Wayne Western

The applicant will state the scale on the surface drainage at selected elevations map.

Response: Appropriate maps have been changed to include the necessary information.

Deficiency No. 2 - Wayne Western

The applicant will provide a cross section for the most critical section of the sediment pond. The most critical section is the shortest distance between the water's edge and the stream channel.

Response: Appropriate maps have been changed to include the necessary information.

Deficiency No. 3 - Wayne Western

The applicant needs to place in the proposal a commitment that if a road is damaged by a catastrophic event, such as a flood or earthquake, the road will be repaired as soon as practical after the damage has occurred.

Response: See Page 4-61.

Deficiency No. 4 - Wayne Western

The applicant will submit proof that the primary road to the waste rock disposal site has been approved for postmining land use by the Division in this submittal.

Response: See Page 4-4 in M&RP.

Deficiency No. 5 - Wayne Western

The reclamation time table will include the schedule for

removing the guard rails and other associated structures.

Response: Reclamation time table changed to include necessary information.

Deficiency No. 6. - Wayne Western

Response: See Page 3-49.

Deficiency No. 7 - Wayne Western

The applicant will state what they will do to prevent combustion in the waste rock disposal site.

Response: See Pages 3-56 and 3-56(a).

Deficiency No. 8 & No. 9 - Wayne Western

The applicant will state what surface material is used on the nongraveled sections. All sections of the access road will be surfaced with durable material.

Response: There are no non-graveled sections. Most of the original road had natural occurring gravels. We spot surface with pitrun materials where there was no gravel. See Pages 3-55 and 4-113.

We have also included pages 4-13 thru 4-25 which shows the new bonding calculations. We still have sufficient bonding to cover this new construction. A copy of our application to construct a small dam is also enclosed.

We are anxious to proceed with this project and would appreciate an early review. If you need any additional information please contact Keith Zobell.

Sincerely,

A handwritten signature in black ink, appearing to read "Ken Payne". The signature is fluid and cursive, with the first name "Ken" and last name "Payne" clearly distinguishable.

*Ken Payne
Vice President/General Manager
Utah Fuel Company*

*KP:KZ:dk
Enclosures*

DOGM0503.KZ