

**Canyon Fuel Company, LLC**  
**Skyline Mines**  
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6 January 2000

Mr. Daron R. Haddock, Permit Supervisor  
Department of Natural Resources  
Division of Oil, Gas and Mining  
1594 West North Temple, Suite 1210  
P. O. Box 145801  
Salt Lake City, Utah 84114-5801

RECEIVED  
JAN 10 2000  
DIVISION OF OIL, GAS & MINING

Re: Cut Slope Elimination, Canyon Fuel Company, LLC, Skyline Mine, ACT/007/005

Dear Mr. Haddock:

Three scenarios were reviewed to either maintain or eliminate cut slopes as part of final reclamation at Skyline thus meeting the regulations. Attached is drawing 4.4.2-1B showing the effect of each of the scenarios in eliminating cut slopes. Cross sections G and I address the Mine 1 portal area. Cross sections A, B, and C address the Mine 3 portal area. The three scenarios are as follows:

1. Leave 2h:1v fill slopes with terraces as approved in the present M&RP. (Dashed Line).
2. Leave 2h:1v fill slopes and eliminate the terraces (Blue Line).
3. Leave 1½h:1v fill slopes over Mine 3 Portals and 2h:1v fill slopes without terraces over the rest of the minesite (Green Line).

Limiting factors that will not allow for total elimination of cut slopes are: the narrowness of Eccles Canyon, the presence of a perennial stream within the canyon, and the location of state highway S. R. 264.

#### Present Approved Plan

The approved plan allows the fill slopes to be at 2h:1v. This slope allows for better infiltration of water into the soil and decreases the possibility of soil erosion. Equipment used to pot mark the slope will have an easier time negotiating the slope. These slopes meet both the safety factor and stability requirements of the regulations. The one draw back to this plan is that from 80 to 120 feet of cut slope is exposed over the Mine 3 portals and from 10 to 15 feet of cut slope is exposed over Mine 1 portals.

#### Terrace Removal

The terraces will be removed and fill slopes would be 2h:1v. This slope allows for better infiltration of water into the soil and decreases the possibility of soil erosion. Equipment used to pot mark the slope will have an easier time negotiating the slope. These slopes meet both the safety factor and stability requirements of the regulations. This plan eliminates the cut slope exposure over the Mine 1 portals and

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reduces the exposed cut slopes to between 50 to 80 feet of cut slope exposed over the Mine 3 portals instead of from between 80 to 120 feet.

#### Steeper Slopes and Terrace Removal

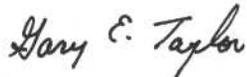
This plan uses two different fill slope horizontal and vertical values. The fill slopes over the Mine 3 portals will be 1½h:1v and the fill slopes for the rest of the minesite will be 2h:1v. No terraces will be used in the fill slopes. Using the fill slope 1½h:1v, eliminates the cut slopes in cross sections A and B but would not eliminate the cut slope in cross section C. The exposed cut slope left in cross section C is 80 feet. The rest of the cut slopes would be eliminated. This plan has three draw backs. The first one is the horizontal value is greater than allowed by regulation. The second draw back is that the equipment used to pot mark the slope will have an awkward time in negotiating the slope. The final draw back is erosion control will require greater effort.

#### Conclusion

Canyon Fuel Company, LLC (CFC) thinks the third plan would eliminate most cut slopes based on the enclosed cross sections. The Division of Oil, Gas and Mining needs to advise Canyon Fuel Company, LLC which plan would best satisfy their concerns. CFC has serious concerns with the long term stability of extensive fill slopes (in excess of 300 feet) at 1½h:1v in this location. Based on the above presented scenarios, CFC prefers to implement the plan would allow for 2h:1v slopes without terraces. Using this scenarios, some cut slopes would remain above the Mine 3 access road. However these cut slopes would be similar to exposed bedrock slopes east of the minesite within Eccles Canyon.

Your evaluation of this response will be greatly appreciated and we look forward to hearing from you soon.

Sincerely,



Gary E. Taylor  
Sr. Environmental Engineer  
Canyon Fuel Company, LLC