

JUL 25 2000

DIVISION OF  
OIL, GAS AND MINING

Canyon Fuel Company, LLC  
 Skyline Mines  
 HC 35 Box 380  
 Helper, Utah 84526  
 (435) 448-6463 Fax: (435) 448-2632

July 24, 2000

Utah Coal Program  
 Utah Division of Oil, Gas and Mining  
 1594 West North Temple, Suite 1210  
 P.O. Box 145801  
 Salt Lake City, Utah 84114-5801

RE: Response to Midterm Review Technical Analysis by DOGM, Skyline Mines,  
 Canyon Fuel Company, LLC, ACT/007/005-MT99.

Dear Sirs:

*INCOMING*

Please find enclosed seven clean copies and three redline-strike through copies of modified and new text of the Skyline Mines M&RP. The modified and new text is submitted in response to the Division's April 7, 2000 Technical Analysis of a previous submittal made in response to the Midterm Review of the Skyline Mine M&RP. These modifications are accompanied by completed C1 and C2 forms.

Following is a brief description of the responses to the technical analysis.

**R645-301-730**, The Permittee must give the Division a detailed plan that included changes the main minesite sediment pond to eliminate NPDES discharge violations and stop discharges of longwall emulsion fluid to the pond and/or Eccles Creek.

Response: A description of the new mine water collection and discharge system has been provided for in Volume 3, Section 4 pages 4-71 through 4-72C. The new system is designed to improve water quality discharged from the mine and avoid discharges of emulsion contaminated water to the pond or Eccles Creek.

**R645-302-270**, The Permittee must give the Division a formal request for a variance from the approximate original contour requirements as stated in R645-301-270, or remove the statements that the mine must be reclaimed to the approximate original contours. Note: the Division believes that the site can be reclaimed to AOC standards. See the analysis section for details.

Response: The M&RP has been modified to the extent where a request for an AOC variance is no longer needed.

**R645-301-542.310**, The Permittee must show the location of the benches that will be left after final reclamation.

Response: No benches will be left after final reclamation as illustrated in the new cross sections and described on page 4-28.

**R645-301-553.130**, The Permittee must show what the maximum slope angle can be and still have that the slopes achieve a 1.3 safety factor. The Permittee should also consider concave slopes when they try to eliminate cutslopes.

Response: The information regarding achieving a safety factor of 1.3 or greater has been added to Volume 5 Section 1 of the M&RP.

**R645-301-533.140**, The Permittee will either show how the straight slopes will be constructed to minimize erosion or use other slope configurations such as concave slopes or slope breaks.

Response: The reclaimed slopes have been redesigned to reduce the number of straight slopes and increase the number of concave slopes. As described in this submittal, the slopes will be deep gouged (or pock-marked) to reduce erosion. The deep gouging has not been illustrated on the new cross-sections.

**R645-301-732**, 1 ) Revised calculations for the riprap size and thickness for all of the reclamation channels. 2 ) Revised designs to provide a concave shape to the reclaimed slopes of the minesite, consistent with the requirement to eliminate the highwalls. 3 ) Labeling of stream reaches on Dwg. 4.4.2-1BA and correction of cross-section stations.

Response: The calculations for riprap sizes and thicknesses as well as channel designs are included in Section 18 of Volume 5. The concave slopes and all other reclaimed slopes used to eliminate highwalls are illustrated on the new cross sections. The stream reaches have been labeled as requested.

**R645-301-121.100**, The Permittee must give the units for the cut and fill quantities.

Response: The units for the cut and fills are located at the top of the cut and fill tables. It should be intuitive that the same numbers given in columns identified by units and then illustrated at the bottom of the page as totals (but lacking the units) have the same unit of measure. Therefore, the table has not been changed.

**R645-301-121.100**, The Permittee must state what the dashed line mean on drawings 4.4.2-1B and 4.4.2.AA.

Response: The dashed lines where illustrative mistakes and have been removed.

**R645-301-542.310**, The Permittee must show the location of the highwalls. That information is needed to verify that all highwalls will be reclaimed.

Response: The locations of highwalls have been illustrated on the new cross sections. We determined this was the cleanest location to illustrate the highwall locations.

**R645-301-542.310**, The Permittee must show what cutslopes will be made in rock and which slopes will be in earth.

Response: No cutslopes will be made in rock.

**R645-301-830.130 and R645-301-542.310**, The Permittee must the location of all concrete structures that will be left in place on the reclamation maps and cross sections.

Response: No concrete structures will be left in place as described in the existing M&RP. The only concrete structures that will remain after reclamation are those that belong to the state highway. All other concrete structures will be removed and either placed in the abandoned portals or placed against cutslopes and backfilled with the appropriate depth of cover.

These modifications should be added to or replace existing text that was submitted in binders in March 2000. If you have any questions regarding this submittal, please call Gary Taylor at (435) 448-2620 or me at (435) 448-2669.

Sincerely,



Chris D. Hansen  
Environmental Coordinator  
Canyon Fuel Company, LLC

enclosures

# APPLICATION FOR PERMIT PROCESSING

<input checked="" type="checkbox"/> Permit Change X	<input type="checkbox"/> New Permit	<input type="checkbox"/> Renewal	<input type="checkbox"/> Transfer	<input type="checkbox"/> Exploration	<input type="checkbox"/> Bond Release	Permit Number: ACT/007/005
Title of Proposal: Mine Site Reclamation						Mine: Skyline Mines
						Permittee: CANYON FUEL CO., LLC

Description, include reason for application and timing required to implement:

**Instructions:** If you answer yes to any of the first 8 questions (gray), submit the application to the Salt Lake Office. Otherwise, you may submit it to your reclamation specialist.

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	1. Change in the size of the Permit Area? _____ acres Disturbed Area? _____ acres <input type="checkbox"/> increase <input type="checkbox"/> decrease.
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	2. Is the application submitted as a result of a Division Order? DO # _____
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	3. Does application include operations outside a previously identified Cumulative Hydrologic Impact Area?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	4. Does application include operations in hydrologic basins other than as currently approved?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	5. Does application result from cancellation, reduction or increase of insurance or reclamation bond?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	6. Does the application require or include public notice/publication?
<input checked="" type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	7. Does the application require or include ownership, control, right-of-entry, or compliance information?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	8. Is proposed activity within 100 feet of a public road or cemetery or 300 feet of an occupied dwelling?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	9. Is the application submitted as a result of a Violation? NOV # _____
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	10. Is the application submitted as a result of other laws or regulations or policies? Explain: _____
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	11. Does the application affect the surface landowner or change the post mining land use?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	12. Does the application require or include underground design or mine sequence and timing? (Modification of R2P2?)
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	13. Does the application require or include collection and reporting of any baseline information?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	14. Could the application have any effect on wildlife or vegetation outside the current disturbed area?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	15. Does application require or include soil removal, storage or placement?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	16. Does the application require or include vegetation monitoring, removal or revegetation activities?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	17. Does the application require or include construction, modification, or removal of surface facilities?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	18. Does the application require or include water monitoring, sediment or drainage control measures?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	19. Does the application require or include certified designs, maps, or calculations?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	20. Does the application require or include subsidence control or monitoring?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	21. Have reclamation costs for bonding been provided for?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	22. Does application involve a perennial stream, a stream buffer zone or discharges to a stream?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	23. Does the application affect permits issued by other agencies or permits issued to other entities?

**x Attach 7 complete copies of the application.**

I hereby certify that I am a responsible official of the applicant and that the information contained in this application is true and correct to the best of my information and belief in all respects with the laws of Utah in reference to commitments, undertakings, and obligations, herein. (R645-201-123)

*[Signature]*  
 Signed - Name - Position - Date  
 \_\_\_\_\_ Mine Manager 7-24-00

Subscribed and sworn to before me this 24 day of July, 2000

*[Signature]*  
 Notary Public  
 320 2004, 19

My Commission Expires: \_\_\_\_\_  
 Attest: STATE OF \_\_\_\_\_  
 COUNTY OF \_\_\_\_\_



**NOTARY PUBLIC**  
**SUSAN SCHULTZ**  
 Scofield Rt. Eccles Canyon  
 HC 35 Box 380  
 Helper, Utah 84526  
 My Comm. Exp. March 20, 2004  
**STATE OF UTAH**

Received by Oil, Gas & Mining

*[Stamp]*

JUL 25 2000

DIVISION OF  
 OIL, GAS AND MINING

ASSIGNED TRACKING NUMBER