



# State of Utah

## DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER  
*Executive Director*

### Division of Oil, Gas and Mining

JOHN R. BAZA  
*Division Director*

September 3, 2015

Corey Heaps, Mine Manager  
Canyon Fuel Company, LLC  
HC 35 Box 380  
Helper, Utah 84526

Subject: Reduce Macroinvertebrate & Fish Monitoring, Canyon Fuel Company, LLC,  
Skyline Mine, C/007/0005, Task ID #4970

Dear Mr. Heaps:

The Division has reviewed your application. The Division has identified deficiencies that must be addressed before final approval can be granted. The deficiencies are listed as an attachment to this letter.

The deficiencies authors are identified so that your staff can communicate directly with that individual should questions arise. The plans as submitted are denied. Please resubmit the entire application.

If you have any questions, please call me at (801) 538-5325.

Sincerely,

Daron R. Haddock  
Coal Program Manager

DRH/sqs  
O:\007005.SKY\WG4970 MACROINVERTEBRATE\Deficiencies.doc



GARY R. HERBERT  
Governor

GREG BELL  
Lieutenant Governor

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## Technical Analysis and Findings

### Utah Coal Regulatory Program

**PID:** C0070005  
**TaskID:** 4970  
**Mine Name:** SKYLINE MINE  
**Title:** REDUCE MACROINVERTEBRATE & FISH MONITORING

#### Environmental Resource Information

#### Fish and Wildlife Resource Information

##### *Deficiencies Details:*

In accordance with R645-301-121.200, the text within the section needs to be modified to reflect the changes that have occurred to the monitoring program. All the "will be" or "will" create confusion to the current monitoring regime since in many cases the "will" is no longer applicable with the approval of this amendment. This also applies to James and Burnout Creeks.

Table 2.9-1a must be updated to reflect "requirements completed" were met for Burnout and James Creeks so it is clear to the reader that monitoring on those creeks is complete.

The proposed change to macroinvertebrate sampling on Eccles Creek does not include one key element discussed during the coordination offers mentioned on page 2-71d. A quantitative measurement of stream health is required to determine adherence to R645-301-358. Prior to approval, the amendment must include information on how stream health will be measured via Biotic Condition Index, O/E, or some other quantifiable measurement.

Ireinhart