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STATE OF UTAH
NATURAL RESOURCES
Oil, Gas & Mining

Revised

Scott M. Matheson, Governor
Temple A. Reynolds, Executive Director
Dr. G. A. (Jim) Shirazi, Division Director

4241 State Office Building • Salt Lake City, UT 84114 • 801-533-5771

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M E M O R A N D U M

January 12, 1984

TO: Dianne R. Nielson, Director
FROM: James W. Smith, Jr., Coordinator of Mined Land Development *Ji*
SUBJECT: Contract Status and Chronology for Emery Deep and Sunnyside Permit Application Package (PAP) Reviews

The Emery Deep Mine PAP for Consolidation Coal Company and the Sunnyside Mine PAP for Kaiser Steel Corporation were contracted for review by the Division to Bio-West/Richardson Associates (BW/RA) and Simons, Li & Associates, respectively, during May 1983, prior to the Office of Surface Mining (OSM) directive to have all existing coal operations permitted by March 1984. The Division attempted to meet this highly optimistic objective by tightening up the review dates established in the original contract relative to the operator's response time and the Division's review time of the consultant's product. The length of time allowed for the consultant's portion of the process, as agreed to in the contract, was left intact although the dates were moved ahead of schedule.

The original contracts did not allow for unforeseen problems or adequately detail dates for operator responses. Thus, the shorter time frames in the revised schedule further amplify shortcomings with the process. Major problems involving the Emery Deep Mine review were Consolidation Coal Company responding to the Apparent Completeness Review (ACR) five weeks beyond the revised contract schedule date and BW-RA providing the Division with an unsatisfactory Draft Technical Analysis (DTA) which will take approximately four weeks to correct due to the holiday season. The DTA was submitted, however, according to the more realistic compliance schedule established by the Division on November 8, 1983. The major problem being encountered in the review of Kaiser Steel Corporation's Sunnyside application is Simons, Li & Associates (SL&A) not being able to provide the DTA by the date established in the Division's latest revised compliance schedule (November 8, 1983). This is primarily due to SL&A's internal planning and their inability to adapt to the Division's change in dates. SL&A has indicated that the DTA will be submitted to the Division in mid-January 1984, approximately two weeks ahead of the original contract. As with the Emery Deep Mine, this will create approximately a four week delay in the Division's November 8th compliance schedule, slipping all subsequent dates the same length of time.

Pending no other unforeseen problems, the reviews for these two operations will be finalized very closely to the dates established in the original contracts.

EMERY DEEP CHRONOLOGY

	Original Contract Date	Revised Date	Actual (Projected) Date
ACR to OGM	6-1-83	6-1-83	6-1-83
ACR to CCC	6-16-83	6-16-83	6-22-83
Mtg. w/CCC	7-16-83	7-1-83	9-8-83
ACR Response		9-2-83	10-7-83
Draft DOC/TD Rev.	11-16-83	9-16-83	10-21-83
DOC to CCC (complete)			10-27-83
Additional Tech. Info. Rec'd			11-14-83, 11-16, 11-18 and 11-25-83
Draft TA to OGM	1-16-84	12-23-83	1-20-84 (P)
Draft TA to CCC	2-29-84	12-30-83	1-27-84 (P)
CCC Response		2-10-84	3-9-84 (P)
Final TA to OGM	3-31-84	3-2-84	3-30-84 (P)
Draft DD to OSM		4-6-84	5-4-84 (P)

SUNNYSIDE CHRONOLOGY

	Original Contract Date	Revised Date	Actual (Projected) Date
ACR to OGM	6-15-83	6-16-83	6-13-83
ACR to KSC	6-30-83	6-30-83	6-23-83
ACR Mtg.	7-31-83	7-16-83	7-26-83
ACR Response		9-16-83	9-2-83
Draft DOC/TD Rev.	11-30-83	9-30-83	10-17-83
DOC Mtg. w/KSC			11-1-83
DOC to KSC (Incomplete)			11-8-83
KSC Response			11-18-83
MRP Complete			11-22-83
DTA to OGM	1-31-84	12-30-83	1-27-84 (P)
DTA to KSC	3-15-84	1-6-84	2-3-84 (P)
KSC Response		2-3-84	3-2-84 (P)
Final TA to OGM	4-15-84	2-24-84	3-23-84 (P)
Draft DD to OSM		3-30-84	4-27-84 (P)

JWS/btb

cc: Ron Daniels
Mary Boucek
Sue Lirner