

0038

file ACT/007/007 #12

**KAISER
COAL**

KAISER COAL CORPORATION
Sunnyside Coal Mines
P.O. Box 10
Sunnyside, Utah 84539
Telephone (801) 888-4421

July 1, 1988

Mr. Lowell P. Braxton, Administrator
Utah Division of Oil, Gas & Mining
355 W. North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

RECEIVED
JUL 11 1988

DIVISION OF
OIL, GAS & MINING

Re: Mid-Term Review
Deficiencies Response
Sunnyside Mines
ACT/007/007

Dear Mr. Braxton:

Enclosed are two copies of the response to the subject review. Please feel free to address any comments or questions to either Barry Grosely or me.

Sincerely,



Carl W. Winters
Manager of Engineering

enc

cc: B. G. Grosely
W. P. Balaz

KAISER COAL CORPORATION
SUNNYSIDE MINES
ACT/007/007

RESPONSE TO
MID-TERM REVIEW
DEFICIENCY COMMENTS

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DIVISION OF
OIL, GAS & MINING
July 1, 1988

UMC 771.23 Permit Applications: General Requirements for
Format and Content

(a) Kaiser agrees to designate all materials (text and maps) related to the approved Permit Revision Application for the B-Canyon area (approved January 14, 1986) as being Book 9, Chapter XVI of the approved PAP. Ten (10) copies of a revised Table of Contents reflecting the change are enclosed. Ten copies of the Table of Contents of Chapter XVI are also enclosed. The ten copies are for Books 1 through 9, including Book 4A.

UMC 783.24 Maps: General Requirements

(a) The Surface Ownership Map (Plate II-1) and Subsurface Ownership Map (Plate II-2) have been revised to show the sale of part of the permit area to Sunnyside Fuel Corporation.

UMC 784.13 Reclamation Plan: General Requirements

(b)(2) A detailed cost estimate of culvert removal has been prepared and is enclosed. It is found on new Page 78a, Chapter III.

(b)(3) The Deed and Bill of Sale of the refuse area of Sunnyside Mines to Sunnyside Fuel Corporation and the associated Operating Agreement between Kaiser Coal and Sunnyside Fuel reserved unto Kaiser the right to use the lands for any and all purposes necessary to conducting the operation of the mines. This includes reclamation of the mine site. Therefore, the soil borrow areas will remain available to Kaiser for use in final reclamation. The topsoil plan does not need revision.

UMC 784.20 Subsidence Control Plan

Plate III-1, Sheet 2 of 3, has been updated to show currently established and proposed subsidence monuments. A copy of the Plate is enclosed.

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UMC 784.23 Operation Plan: Maps and Plans

The surface facilities map (Plate III-1) has been reviewed. The Coarse Refuse Toe Sediment Pond depiction has been corrected.

The text on Page 3-8, Section 3.3.1 has been corrected to read "Kaiser Steel". Page 3-10, Section 3.3.1.3 has likewise been corrected. Revised copies of the pages are enclosed.

UMC 817.41 Hydrologic Balance: General Requirements

No mining was conducted in Section 13 of the B-Canyon area in 1987 nor did the Mine Sequence Map, dated March 30, 1988, and submitted as part of the 1987 Annual Report indicate any such mining. Kaiser will install the agreed upon underground borehole monitoring station prior to such mining.

UMC 817.42 Hydrologic Balance: Water Quality Standards and Effluent Limitations

Several areas under this section require hydrologic maintenance. Kaiser will commence the requested maintenance work immediately and will continue to work on the items within the constraints of manpower and budget. As the Division is aware, the future operating status of the Sunnyside Mines is being decided. Kaiser will keep the Division informed of the decision and any potential effects on the hydrologic maintenance program.

Other comments (as numbered by the Division) are addressed below. Small area exemptions are requested for the Borrow area and the Manshaft Substation area. Appropriate Plates are enclosed.

✓ 2. Number 2 Canyon Fan

Plate III-32 (2) is revised to reflect the field conditions.

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3. Water Canyon Portals

✓ Plate III-32 (3) is revised to reflect the field conditions.

Deposition under the concrete bridge in Water Canyon will be removed such that an adequate channel is provided.

✓ Undisturbed area runoff will be prevented from entering the portal on the north side of Water Canyon through the use of sand bags and/or other hydrologic controls (such as ditches or berms). Additionally, when the deposition under the bridge is removed, the problem with water entering the portal may be alleviated.

5. Whitmore Fan

✓ Plate III-32 (5) is revised to reflect the field conditions, including the ditch section.

6. Number 2 Mine Fan

Plate III-32 (6) is revised to indicate field changes which will be made to prevent additional erosion at the substation.

✓ 8. Borrow Areas

Plate III-32 (8) depicts the field conditions at the site. Plans for a sediment pond at the location were submitted to the Division on June 30, 1988.

✓ 9. Manshaft Substation

Plate III-32 (9) depicts the field conditions at the site.

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10. Old Coarse Refuse Toe Pond

Reclamation has commenced on the site. The area will be addressed in the response (due July 22) to the Division on the Incidental Boundary Change at the site.

UMC 817.46 Hydrologic Balance: Sedimentation Ponds

Please see the discussion above under UMC 817.42, part 10.

UMC 817.103 Backfilling and Grading: Covering Coal and Acid- and Toxic-Forming Materials

(a)(3) Kaiser agrees that the coarse refuse test plot has been generally unsuccessful. A revised test plot design will, in all probability, be submitted for approval.