

0016



Norman H. Bangarter
Governor
Dee C. Hansen
Executive Director
Dianne R. Nielson, Ph.D.
Division Director

State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203
801-538-5340

September 15, 1988

TO: John Whitehead, Permit Supervisor

FROM: Pamela Grubaugh-Littig, Reclamation Engineer *pgl*

RE: Completeness and Technical Deficiency Items - Sunnyside Fuels Corporation (September 7, 1988) Kaiser Coal Corporation, Sunnyside Mine, ACT/007/007, Folder #2, Carbon County, Utah

Synopsis

I reviewed the draft PAP of the Sunnyside Fuels Corporation submittal dated September 7, 1988. Sunnyside Fuels Corporation prepared the PAP in a site specific manner, i.e., only roads and facilities associated with this permit area were addressed. The plan is complete except for UMC 784.23(b)(3) and several engineering concerns must be technically qualified.

This PAP was written in terms of coal mine production from the Sunnyside Mines with no contingency plan for no coal waste produced.

Analysis

The applicant must delineate on a map the area of land for which the performance bond will be posted (UMC 784.23(b)(3)).

Several engineering issues in the Sunnyside Fuels Corporation PAP must be qualified:

UMC 817.11 Signs and Markers - (PGL)

The signs and markers addressed on pages eight and nine were not site specific as to size of markers, material and information on the signs. Plate III-11 and III-13 did not identify specific locations for signs. This information must be submitted for inclusion in the PAP.

Page 2
Memo to J. Whitehead
ACT/007/007
September 15, 1988

UMC 817.81 Coal Processing Waste Banks - (PGL)

Plate III-2, 1 of 3, was certified in 1985. The current configuration of the refuse area should be certified.

Plate III-3, 2 of 4, was certified (no date given), and revisions have been made since the original certification without notation. This as-built drawing should be certified and dated as such.

Plate III-3, 4 of 4 (Rail Cut Pond), should be a current as-built drawing. Please submit this as-built drawing for inclusion in the PAP.

UMC 817.85 Coal Processing Waste Banks: Construction Requirements - (PGL)

(d) Sunnyside Fuels Corporation bought and now owns all of the borrow material areas for the entire Sunnyside Mine permit area. The Operating Agreement between Sunnyside Fuels Corporation and Kaiser Coal Corporation states on page 3 that "Whereas, under the Deed, the Operator, Kaiser Coal Corporation, has reserved unto itself, its successors and assigns, the right to continue to deposit gob, coal tailings and slurry discharge from the Sunnyside Mines and the right to use the Real Property for any and all purposes necessary to conducting the operation of the Sunnyside Mine in accordance with the terms of the Reclamation Permit and other environmental permits associated with the Real Property subject to an Operating Agreement and an Operating Plan mutually acceptable to Operator (Kaiser Coal Corporation) and Owner (Sunnyside Fuels Corporation) and, if required, approved by permitting authorities." It is implied that the borrow material will be available for the Sunnyside Mine Permit Area, but it should be made perfectly clear that this borrow material can be used for the reclamation of the Sunnyside Mine permit area.

Some of the information included in the PAP is not necessary and can be deleted. For example, the "Special Coarse Refuse Use Study Report" (Appendix VI-I) is informative, but not necessary. Chapter XII is not necessary.

Page 3
Memo to J. Whitehead
ACT/007/007
September 15, 1988

Recommendations

The draft PAP will be complete when UMC 784.23(b)(3) is addressed. All plates must show current configurations and contain certified as-builts for appropriate structures. Regulations numbered UMC 817.11, 817.81 and 817.85(d) should be addressed for technical adequacy.

The applicant should be realistic and present the project with the possibility of no Sunnyside Mine coal production.

djh
WP+/25-27