0041

State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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TO: Richard V. Smith, Permit Supervisor

FROM: Pamela Grubaugh-Littig, Reclamation Engineer pgl

RE: **Meeting With Bill Balaz, Sunnyside Reclamation and Salvage, Inc., Sunnyside Mines, ACT/007/007, Folder #2, Carbon County, Utah**

A meeting was held with Bill Balaz, General Mine Manager of Sunnyside Mines, on June 1, 1989, to review the reclamation cost estimate and proposed changes to Chapter III. A list of the changes that were made to simplify and update the text were discussed (attached).

As a result of that discussion:

a. The Sunnyside Fuels Corporation project (coarse refuse pile) will not be included in the text at this time. Sunnyside Reclamation and Salvage, Inc. (SRS) will post a bond for that area.

b. SRS will submit a letter from a responsible party regarding the permanence of several buildings and how that party will be responsible for those buildings during the 10-year bond liability period and beyond.

c. SRS will resubmit a revised Chapter III with all changes noted in a cover letter.

d. The reclamation cost estimate will continue to be reviewed by the Division.

djh
Attachment
AT4/65

an equal opportunity employer

KRH Notes chapter 3 revisions

New text or 3.2.9 old text

clarify

3.2.8 (Last Paragraph) New text references CRB & CRS. How does monitoring of CRB CRS & ICE-1 apply with the sale of property to EPC. 004, 007, 008, 009 & 012 five UPDES monitoring points transferred direct when (SUNNYSIDE FUELS) EPC was awarded a UPDES permit.

in EPC unit

New text or 3.3.1.6 old text

3.3.1.5 Reference to 004 is still in revised text. Since 004 has been officially transferred to Sunnyside fuels this point & text referencing to it will need to be removed.

Make text consistent with table

Page 37 of revised text

Quantities of stockpiled topsoil need to reduce list to correspond to table. Table 3-21 of Bond calculations includes areas owned SRS.

List on 37 is not comprehensive and has a few areas missing Example Twinshaft pond area #2 canyon cover pond etc.

- TEXT -

1) simplify make more readable
2) ~~duplication~~ made references in different sections of text to one item consistent may have brought into one area.
3) updated to reflect changes in mine operation and new estimate.

1. Reference to 72 Acres? sold to Sunnyside Fuels Corp excluded from bond. The bankruptcy court sold SFC the land with the proviso that they would bond the land that was purchased.

goes back

2. Final acreage still has to be reviewed & was not included on P. 1 of Chapter 3 since the 72 acres ~~was~~ (above) was a questionable number & Total acreage & reclaimed acreage have to be verified.

goes back

ok 3. SRS added 12 portals & shafts that need to be sealed. ~~Most~~ were shown on maps submitted by Kaiser but were not included in lists of portals and shafts. Some of the portals need to be verified in the field as to condition.

ok 4. 3.2.3 was removed & included in Surface Facilities/Construction Plans

ok 5. Some of text rewritten for clarification i.e. original Section 3.2.10.1 (Belt conveyors & rail tracks) was moved into Section 3.2.3, Coal Handling, Processing, Preparation & Storage.

ok 6. Section 3.2.8.4 – Additional substation added. This sub was in at the time the original text was written but was not covered. Part of Section 3.3.1.6 on electrical was moved to this section

goes back 7. Reference to the slurry cells on p. 6 of original text was removed.

ok 8. 3.2.10 Shortened to Culverts & Roads since only culverts & roads ~~(not Par~~ were described in original text (not Parking areas & Railroad Spurs)

(...dule)

9. 3.2.10 Permit Term Disturbance Area Area revised to exclude SFC acreage. As noted in 2. above the acreage still needs to be pinned down.

goes back

Question — Do we put the SFC acreage number back in permit? We have also added borrow pond sed. pond. that has to go into acreage.

10 3.3.1.2 Portals shafts & slopes incorporated in section 3.2.2 Portals & shafts

ok

ok Reorganized Mining Schedule added after 3.3.1.2

12 3.3.1.3 Mining Methods ~~changed to~~ ~~changed to~~ removed

3.3.1.4 Mine Development text repetition was removed. & mine plans in text were modified to represent present plans.

ok

update 3.3.1.5

ok 13 Ventilation air modified to reflect current ventilation.

14 3.3.1.5 Water systems changed to reflect current piping

Electrical moved to ~~3.2.10~~. 3.2.5

15 3.3.3.1 Projected Maximum Recovery - only current estimates of recovery included & not possible historical rule of thumb estimates

ok

16 Annual Production per Year for Permit Term modified to reflect current production estimates & permits available

ok

17. 3.3.6.3 Employment (Operating Schedule) number of people modified
ok

18. 3.3.7 Acreage & Delineation of Mine permit Area covered in previous sections of chapter III
ok

19 3.3.8 Mine plan area Removed Verbage covered in other
ok sections. A 25 year mine plan cannot be projected at present.

20 3.4.3.1 Projected Impacts of Mining on Hydrological
ok Balance. Tables updated

21 3.4.3.2 Control Measures to Mitigate Impact.
ok References of As builts & ponds to be installed that have been completed and data submitted were removed from the verbage.

22 Subsidence Control Plan
ok Updated subsidence monitoring verbage & tables included

23 3.4.9 Waste Disposal Plans
goes back Slurry & coarse refuse taken out of this section & description of SFC responsibilities & SRS rights included.

24 3.4.9.1 Coal slurry refuse rewritten somewhat to
goes back reflect current operating conditions & potential to reactivate WSC after a geotechnical study completed
Some verbage removed — we may have to put back in if we are responsible for bonding

Goes back b. Coarse refuse some statements left out but may have to be put back in if we are responsible for bonding.

11 e) Toxic or acid-forming materials included with underground development waste

25. 3.5.1 Contemoraneous Reclamation ((i) Coarse refuse disposal area) taken out. Will have to be put back in if we are responsible for bonding

Goes back

26. 3.5.1.2 Soil Removal & Storage

Slaughter Canyon acreace removed. Bond liability Reveg. Section rewritten to make more readable. No wanded previous committments were excluded

updated OK

added table on p 38 From another Section

27. 3.5.3.1 Sealing of Mine Openings

Sealing and filling with 25 ft. of material was changed to Sealing or filling & ~~appriate~~ appropriate tables modified to reflect change. Also, portals that cannot be accessed by road were proposed to be blasted shut for at least 25 ft.

OK

where highwall reduction done over portal headwalls the headwalls will not be removed unless it is visible after regrading.

28. Removal of Surface Structures

East Carbon Letter. Permanent structures, including ~~#~~ transformers necessary to provide power to ~~permant~~ permanent.

structures that are to remain were shown. The original document included most of the structures that were to remain.

b) Shafts & portals sealing under separate area

goes back c) in original text included refuse area. This was removed as part of SFC responsibility

29 3.5.3.3 Disposition of Dams, Ponds & Diversions

a) may need to add renovation to design specs previously approved by the Dam Safety Division I have not seen design specs or modification list.

b) Slurry ponds removed as SFC responsibility.

goes back May have to be put back in text

30 3.5.4 Backfilling & Regrading Plans

paragraph on coarse refuse may have to go back in

goes back

Reference to exposed coal seams moved to

ok ~~Remov~~ 3.5.4.2 Removal or Reduction of Highwall

ok → References to documents that were to be submitted at time of original permit were excluded.

31 ~~Refer~~ 3.5.4.4 Soil Distribution & Stabilization

ok Some rewrite to try & clarify & simplify text.

32 3.5.5.1 Soil Preparation

goes back Paragraph on soil prep. for refuse taken out May have to put back in.

Cypress Salian

Part Back

33 Seeding & Transplanting There is currently no work going on for additional species. This paragraph was removed

34 3,5,6 through 3,5,6,5 Schedule of Reclamation ~~Reclamation Monitoring~~ ~~was included~~

Renumbered, & rewritten to try to clarify. Areas on pp 81-83 old permit brought forward to consolidate & clarify

Portions pertinent to other areas were included in previous sections

35 3,5,7 Cost Estimate for Reclamation

Tables redone & calculations modified to clarify

update

36 Culvert Removal

Some culverts were not shown on original maps Subsequent revisions have been sent in to reflect location and cost of removal. ~~The~~ Some of the costs include culverts on SFC land.

37 Pond Reclamation Costs

The slurry ponds were not included These may have to be put back in estimate

38 40% revegetation failure is included this is a major part of a contingency factor that was not included previously

39. Construction management % of total job from Means was added to replace fixed cost for managing contracts for a fixed number of people for a fixed period of time.

Cost Tables

III-1 Several structures were added along with descriptions & demolition costs on a single table.

III-5 Spreadsheet showing portals, seal status & cost to seal developed.

III-6 Shaft sealing cost developed based on Table III-8

III-9 Portal closure & fill
Details cost of hauling material to portals that are not included in highwall reduction or have to be blasted shut. Does not include both sealing & backfilling portals.

III-10 Drill Hole Cementing - gives cost of ~~only~~ cementing only known open holes.

III-11 through III-18 all costs revised to reflect current seed & reclamation cost

Table III-20 Highwall regrading

Spreadsheet table that shows individual grading, ripping & haulage & backfill cost for all material moved based on previous X-sections. Costs developed in tables III-31 through III-37.

Costs for the train loadout & Prep Plant highwall were developed from cut/fill balance contours rather than a single cross section for each area. See tables III-37 & III-38 for balance calc's.

Table III-29 is a summary of all costs. includes a 40% revegetation failure rate which is 2.27% of total costs

No subsidence monitoring costs included in postmining reclamation costs. 817.124 & .125 do not address continued subsidence monitoring