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May 17, 1989

TO: Richard V. Smith, Acting Permit Supervisor

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

RE: Amendments Required for Changes in the Approved PAP, Sunnyside Reclamation and Salvage, Kaiser Coal Corporation, Sunnyside Mines, ACT/007/007, Folders #2 and #4, Carbon County, Utah

Synopsis

The Sunnyside Mines operator, Sunnyside Reclamation and Salvage, Inc. (SRS) submitted a revised reclamation bond estimate to the Division for the Sunnyside Mines on March 3, 1989. On April 7, 1989, more information was sent to the Division in the form of text changes to Chapter III of the approved plan.

Analysis

Significant changes were made in the PAP that require specific technical review.

General comments about the text and reclamation cost estimate are as follows:

1. Throughout the revised text and bond estimate, portions of the permit area were designated as "excluded to Sunnyside Fuels Corporation." This statement is not valid. Portions of the permit area have not, as of this date, been transferred to Sunnyside Fuels Corporation because there are outstanding deficiencies in the permit transfer that must be adequately addressed (i.e., posting of the bond).

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All references to the "excluded coarse refuse" that were deleted in the bond estimate and text must be re-inserted into the PAP.

2. The surface facilities section of Chapter III was deleted. The applicant proposes to retain some buildings as permanent that were previously scheduled for demolition. If the buildings are proposed to be permanent, the post mining land use of each of the buildings must be explained in the PAP.
3. Subsidence monitoring costs must be added to the cost estimate.
4. A 10 percent contingency factor must be added to the cost estimate.

#### Recommendation

The applicant should submit a list of all the changes in the March 3, 1989 and April 7, 1989 submittals. Changes to the approved PAP require amendments, then revisions to the reclamation cost estimate will follow approval of these amendments.

djh  
AT4/44-45