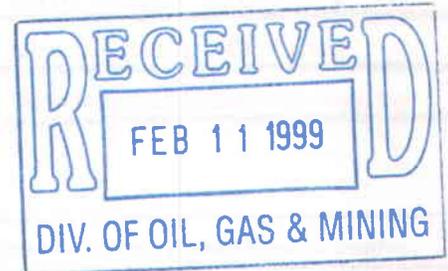


UtahAmerican Energy Inc.

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February 11, 1999

Darron Haddock
Division of Oil Gas & Mining
1594 West North Temple, Suite 1210
Salt Lake City, Utah 84114-5801



Subject: 2nd Administrative Completeness Review

Dear Mr. Haddock;

Please find enclosed my responses to the 2nd Administrative Completeness Review.

It was very helpful meeting with your technical staff on a one on one basis to discuss the deficiencies.

I have enclosed a work sheet showing information related to the deficiencies such as regulation, description, comments, and responses. The initials of the person stating the deficiency is listed for quick reference. I hope this will make the review a little simpler.

It has been reported that UtahAmerican Energy, Inc. used the wrong regulations when writing the permit, specifically the engineering section. When the LiLa permitting process began I met with DOGM to discuss the permit and was given the latest most up to date regulations which were the November 1996 version. The permit was written using the 1996 version. I was not even aware that a new version 1998 was available until Wayne Western pointed it out to me. UtahAmerican Energy, Inc. will address the differences in the two versions during the technical review process.

Hopefully with this submittal you can find the Lila Canyon significant revision administratively complete. I am anxious to get into the technical review process as soon as possible.

Should any section of any chapter be determined to be not administratively complete I would appreciate being notified immediately so an appropriate response can be prepared.

Sincerely,

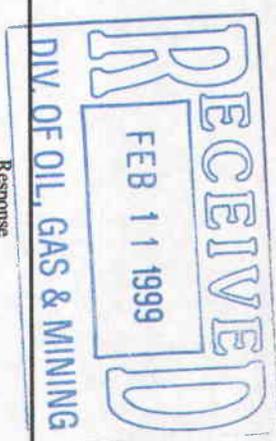
R. Jay Marshall P.E.

Chief Engineer

UtahAmerican Energy, Inc.

*ACT/007/013 #2
Copy Darron
Have*

ACR SECOND ROUND OF DEFICIENCIES.



Regulation	Who	Description	Comment	Response
301-200	RAD	Soils	None of the maps show a disturbed area boundary and therefore, the Division is unable to ascertain if soil resources information is complete. Information in the plan is vague at best, confusing, contradictory and inconclusive. Therefore, the Division is unable to ascertain if soil resources protection measures are adequate of meet regulatory compliance.	The disturbed area has been highlighted on Plates 2-2, 2-3, 5-2, 7-2, 7-5 as well as others. Chapter 2 has been rewritten in its entirety by Mr. Dan Larsen.
211	RAD	Description of Premining soil Resources	Need disturbed area boundary shown on all maps to ascertain if soil resource information is complete.	Same as above: The disturbed area has been highlighted on Plates 2-2, 2-3, 5-2, 7-2, 7-5 as well as others.
212	RAD	Soil Resource Protection Measures	Need pre-disturbance contour lines on soil salvage map. Need a soil salvage map. Need disturbed area boundary shown on soil salvage map to help determine if soil is being salvaged from disturbance affected areas. Information in the plan is vague at best, confusing, contradictory and inconclusive. Therefore, the Division is unable to ascertain if soil resources protection measures are adequate of meet regulatory compliance.	Pre-disturbed contour lines can be found on Plates 2-2 and A2. Plates 2-2 and A2 addresses soil salvage. Same as above: The disturbed area has been highlighted on Plates 2-2, 2-3, 5-2, 7-2, 7-5 as well as others. Same as above: Chapter 2 has been rewritten in its entirety by Mr. Dan Larsen.
224	RAD	Substitute Topsoil Info (When Proposed)	Adequate soil survey for reclaiming the entire mine site needs to be ascertained before a determination can be made that substitute topsoil is not needed. One specific area of concern is the rock outcrop/Badland slopes. If these areas contain no soil and cannot be revegetated, then reclamation can not be achieved. Appropriate quantities of topsoil and substitute soils and rock need to be salvaged and stockpiled for reclamation of those difficult areas.	As can be seen from the text in chapter 2 substitute topsoil is not necessary and is not proposed. The outcrop/Badland slopes are addressed in chapter 2. Adequate topsoil salvage and stockpile are addressed in chapter 2.
230	RAD	Operation Plan: Topsoil Handling/Removal/Storage	The exact location, size dimension, etc of the topsoil stockpile is needed based on projected soil salvage volumes. Final configuration should be sized and shaped to show that enough room is available for projected soil salvage.	Topsoil size and dimensions are discussed in Section 232.100 and shown on Plate 5-2. The pile has been sized to contain the amount of recovered topsoil as discussed in Section 232.100.
240	RAD	Reclamation Plan: Soil Redistribution/Stabilization	Need a soil redistribution and placement map. Projected soil replacement depths should be outlined for each reclaimed area. One specific area of concern is the rock outcrop/Badland slopes. If these areas contain no soil and cannot be revegetated, then reclamation can not be achieved. Reclamation of these difficult areas will need to be addressed in depth to assure that reclamation can be achieved.	The soil redistribution and placement map is Plate 2-2. The rock outcrop/Badland slopes are addressed in Chapter 2.
301-411	PB	Pre-Mining Land Use Information	Information is not complete. The application mentions the wilderness study area with which the proposed permit area overlaps, but it does not discuss the BLM's land use plans for the wilderness study area.	The WSA is discussed on page 11 of chapter 4. The BLM's EA #Ut-066-93-28 discusses the WSA and is included in Appendix 4-1.
412	PB	Post-Mining Land Use Information	Application does not contain comments concerning the post-mining land use from the land owner. The application is proposing to leave the sediment pond.	A letter from BLM affirming the post-mining land use is included in Appendix 4-2. The application does not propose to leave the sediment pond.

301-510 and 520	WW	General Description of Operation Plan: (Maps, Locations, Cross-Sections, Narrative, Descriptions & Calculations)	The Permittee did not provide the Division with an adequate description of the operation plan.	The only existing structure is a culvert and it is discussed in 526.100 and shown on plate 5-1A. Operational contours are shown on Plate 5-2. Pre-mine contours are shown on plate 5-1A. Post-mine contours are shown on plate 5-6.
522	WW	Coal Recovery Description	The Division needs detailed information on how coal recovery will be maximized. This information is similar to that required by the BLM for the R2P2.	Plate 5-5 shows the timing and sequence for the mine plan. Recovery is discussed in section 522. An R2P2 has been filed with the BLM.
525	WW	Subsidence Control Plan	The operator claims that a subsidence control plan is not needed because there are no renewable resource lands in the permit area. However, the Operator already committed to conduct a subsidence survey in the existing plan. Therefore, a subsidence control plan is needed for the Lila Canyon revision.	This was addressed in the last submittal. A subsidence control plan can be found Section 525. The limit of potential subsidence can be found on plate 5-5.
526	WW	Mine Facilities Description (Narrative, Plans, Maps) Including existing Structures & Support Facilities	The Operator did not describe the new facilities at the Lila Canyon mine. See R645-301-526.100.	The description of the conveyors has been added to the facility description. The conveyor are described in section 526.200.
533	WW	Impoundments	Appendix 7-4 does not address the engineering requirements for impoundments	Appendix 7-4 does address the engineering requirements for impoundments. Additional comments can be found in Appendix 5-5 addressing draw down.
301-534	WW	Roads	The Division does not have enough information to determine if the access roads to the site need to be permitted.	Appendix 1-4 contains county correspondence.
536	WW	Coal Mine Waste	Amendment does not have plans. The operator restates the regulatory requirement.	Appendix 5-7 and chapter 5 section 536 discusses coal mine waste.
537	WW	Regraded Slopes	The Permittee did not give enough information about the regraded slopes, or why they would be left in place. Since the site is undisturbed, the Permittee should be able to achieve the approximate original contour requirements.	No steep slopes are being projected.
553	WW	Backfilling and Grading Description	The Permittee did not provide the Division with adequate narrative of the backfilling and grading plan.	Cross sections can be found on Plates 5-7A and 5-7B. Backfilling and grading are addressed in section 553.

