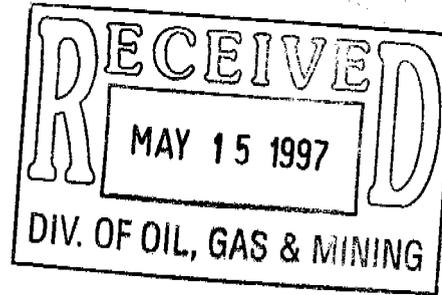




Canyon Fuel Company, LLC
 Skyline Mines
 P.O. Box 719
 Helper, Utah 84526
 801/637-7925 Fax: 801/636-2632



May 14, 1997

Daron Haddock
 Permit Supervisor
 Coal Program
 Division of Oil, Gas and Mining
 1594 West North Temple, Suite 1210
 Box 145801
 Salt Lake City, Utah 84114-5801

Re: Responses to Alkali Significant Revision deficiencies, Soldier Canyon Mine

Dear Mr. Haddock:

ACT/005/1018 #2

Thank you for your fax of April 21, 1997, in which you listed the deficiencies to the above referenced permit revision that need to be addressed before the Division can complete its decision document. The following are our responses to those deficiencies:

R645-301-121.200, -722.300, -724.100 -- Well 11-2 is not shown on Exhibit 7.21-1, contrary to the statement in Table 7.24-4.

Table 7.24-4 (page 7-22) has been revised to state that Well 11-2 is proposed to be monitored as part of the Dugout Canyon Mine permit.

R645-301-121.200, -722.300, -724.100 -- Location and elevation for many monitoring stations that were used to gather baseline data on water quality and quantity in preparation of the Soldier Canyon Mine permit application have been removed from Exhibit 7.21-1 and are not shown on another map in the Alkali Tract Significant Revision as submitted.

The 6/1/93 version Exhibit 7.21-1 that shows all of the water monitoring locations for the Soldier Canyon Mine permit has been renamed Exhibit 7.21-5 and is referenced on page 7-5. This change requires the replacement of pages 7-5 and 7-6. This exhibit along with the exhibit in Appendix 7N should now show baseline monitoring stations for both the Soldier Canyon Mine and the Alkali Tract.

R645-301-121.300 -- Pagination is incorrect on pages 41, 54, and 62 of Appendix 7M, which were submitted to correct deficiencies identified previously. These corrected pages cannot be inserted into the Alkali Tract Significant Revision as submitted.

These corrected pages have been properly incorporated into Appendix 7M and this appendix has been recopied in its entirety for replacement in this revision.

R645-301-121.200, -722.300, -731.210 -- Table 7.24-1 in the Alkali Tract Significant Revision indicates springs 3, 15, 18, and 21 are "current water monitoring sites." Their designation as "current water monitoring sites" in Table 7.24-1 of the Alkali Tract Significant Revision is confusing.

This wording was used because when this revision is approved these sites will be current water monitoring sites and the wording will be correct. If other wording such as "proposed" were used then that wording would not be correct when the revision is approved and would need to be changed. To reduce this confusion the parenthetical statement "(as of approval of this amendment)" has been added to page 7-7 as a note to Table 7.24-1.

R645-301-121.200, -722.300, -724.100, 731.210 -- There appears to be confusion as to the exact location of spring 5. Exhibit 7.21-1 shows spring 5 to be at or near the same location as spring 55 on the Sunedco Sage Point/Dugout Canyon Hydrology Map and it was previously suggested in Table 7.24-1 of the Soldier Canyon Mine MRP that these two sites were equivalent. The new Table 7.24-1 indicates spring 5 is equivalent to CC-55, which according to Appendix 7N, is a pond that is located 1,500 feet downstream of the location shown on Exhibit 7.21-1 and that it has been sampled as "Spring 5" in the past.

Spring 5 in the Soldier Canyon Mine permit and Spring 55 on the Sunedco map are equivalent and issue from a pipe in the side of the drainage in which it is located. Apparently the consultant who conducted the study in Appendix 7N sampled the stock-watering pond that is fed by Spring 5 rather than the spring itself. We have no explanation of why he sampled the pond rather than water flowing from the pipe. We believe that this issue is irrelevant for this spring because there are sufficient data regarding quality and quantity of this spring without the data in Appendix 7N. Since we cannot change the report of a consultant, we request that the Division simply disregard the description given in Appendix 7N for Spring CC-55 (Spring 5).

R645-301-121.200, -724.100 -- Table 7.24-1 indicates that two seasons of baseline data for springs CC-36 and CC-40 are in Appendix 7N. Appendix 7N contains one analysis report for CC-40 data 5/18/93, and nothing for CC-36.

Table 7.24-1, page 7-7, has been revised to simply state that "Data for these sites are included in Appendix 7N." Additional analysis reports for these springs have been found and are submitted herewith for insertion into Appendix 7N.

R645-301-121.200, -724.100 -- Recharge to the LOM area is twice stated to be 742 acre-feet/year on page 7-33 rather than the updated value of 758 acre-feet/year given in Table 7.24-3. Other pages should also be checked to be sure that the currently projected recharge rate is used consistently throughout the plan.

Page 7-33 has been corrected.

R645-301-121.200, the Permittee must present the subsidence control plan in Section 5.25.10 of the amendment in a clear and concise manner. The Permittee must state how they calculated the maximum subsidence buffer zone. The maximum subsidence buffer zone on Exhibit 5.25-1 appears to be based on the projected subsidence for the areas where second mining will occur. The text

suggests that they calculated the maximum subsidence buffer zone for all minable areas. The Permittee does not show those areas where the maximum subsidence buffer zone calculations are based on a 22.5° angle of draw and those based on a 35° angle of draw.

Pages 5-17 and 5-17a have been revised to state that the subsidence zone shown on Exhibit 5.25-1 was calculated using a 35° angle of draw from the areas proposed to be second mined. Exhibit 5.25-1 has also been corrected and is submitted herewith for replacement in the permit.

Because conditions in the Incidental Boundary Changes for the Alkali Tract have been adverse and we have not been able to mine in these areas as long as planned it is essential that we receive approval to begin mining in the Alkali Tract as quickly as possible to maintain operation of the Soldier Canyon Mine. It is respectfully requested that additional concerns with the Alkali Tract Significant Revision be addressed as stipulations to the approval. Also any help you could provide in achieving rapid Federal approval would be appreciated.

Thank you for your help with this revision and if there are any questions please contact me at 636-2669.

Very truly yours,

A handwritten signature in black ink, appearing to read "Barry Barnum", with a stylized flourish at the end.

Barry Barnum

