



Canyon Fuel Company, LLC  
 Skyline Mines  
 HC 35 Box 380  
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OK

August 2, 2002

Coal Regulatory Program  
 Attn.: Pam Grubaugh-Littig  
 Division of Oil, Gas and Mining  
 1594 West North Temple, Suite 1210  
 Box 145801  
 Salt Lake City, Utah 84114-5801

*Response*  
*J. BR01B*  
*Jean*  
*8/02/02*

RE: Phase I Bond Release Gordon Creek No. 2/7/8 Mines ACT/007/016 - BR01B Carbon County, Utah

Dear Pam:

Enclosed are 3 copies of the Mountain Coal Company response to the deficiencies in the Phase I Bond Release T/A dated February 25, 2002.

The information herein submitted is intended for inclusion in the M.R.P.; however, it will address those deficiencies noted in the Bond Release Application. It should be noted that some of the requested information has been previously submitted and approved by the Division.

In an effort to expedite the review, I have attached a checklist for each of the listed deficiencies along with an explanation of where and how they were addressed.

A C<sub>1</sub>/C<sub>2</sub> Form is also enclosed. It is our hope this submittal will meet with your approval and we can arrange for any required on-site visits this summer or fall. If you have any questions, or need additional information, please let me know.

Sincerely,

Chris Hansen  
 Project Representative  
 cc: Phil Schmidt  
 Dan Guy  
 File

**RECEIVED**  
 AUG 02 2002  
 DIVISION OF  
 OIL, GAS AND MINING

## Deficiencies Checklist

**R645-301-142** - Soil Testing results were submitted to the Division on Oct. 29, 1996 as a new Appendix 8-3.

**R645-301-242** - Soil placement location and thickness are described on Table 8-5A (Page 8-59) of the M.R.P., also submitted to the Division on Oct. 29, 1996.

**R645-301-412.200** - Letters have been previously sent to Robert Jewkes, with no reply. Included is a copy of a new letter, sent certified, to Robert and Linda Jewkes. This should be added to the M.R.P. in Appendix 4-1.

**R645-301-542.300 and R645-301-121.200** - A new Plate 3-7 (designated AAs-Built@) is included. The Nov. 4, 1999 Plate 3-7 was the as-built as indicated in the Amendment AM99A. The maps were noted incorporated into the M.R.P. on March 19, 2000.

**R645-301-542.320** - The new Plate 3-7, included with this submittal, shows the location where unsuitable material (coal) was buried under 4' of suitable material. No other acid/toxic or unsuitable material was buried on site.

**R645-301-764** - The reclamation time table has been updated on Page 3-64.

**R645-301-830.140** - A detailed reclamation cost estimate for reclaiming the sediment ponds, Sweet=s Pond and vegetation costs is included as a new Appendix 3-12.

**R645-301-880.120** - The public notice has been revised and will be published as required upon approval by the Division. This is a new Appendix 2-7 for the M.R.P.

**R645-301-880.130** - A notarized statement, as required, is provided for the bond release application. This is a new Appendix 2-8 for the M.R.P.

**R645-301-880.210** - Water quality data has been summarized for the entire site, including the disturbed area, in Appendix 7-8. This appendix was part of Amendment AM99C-4, approved August 22, 2001.

# APPLICATION FOR PERMIT PROCESSING

Permit Change <input checked="" type="checkbox"/>	New Permit <input type="checkbox"/>	Renewal <input type="checkbox"/>	Transfer <input type="checkbox"/>	Exploration <input type="checkbox"/>	Bond Release <input checked="" type="checkbox"/>	Permit Number: ACT/007/016
Title of Proposal: Response to Phase I Bond Release Deficiencies.					Mine: Gordon Creek 2/7/8	
						Permittee: Mountain Coal Company

Description, include reason for application and timing required to implement: Deficiencies per T/A.

**Instructions:** If you answer yes to any of the first 8 questions (gray), submit the application to the Salt Lake Office. Otherwise, you may submit it to your

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	1. Change in the size of the Permit Area? _____ acres Disturbed Area? _____ acres <input type="checkbox"/> increase <input type="checkbox"/> decrease.
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	2. Is the application submitted as a result of a Division Order? DO #
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	3. Does application include operations outside a previously identified Cumulative Hydrologic Impact Area?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	4. Does application include operations in hydrologic basins other than as currently approved?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	5. Does application result from cancellation, reduction or increase of insurance or reclamation bond?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	6. Does the application require or include public notice/publication?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	7. Does the application require or include ownership, control, right-of-entry, or compliance information?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	8. Is proposed activity within 100 feet of a public road or cemetery or 300 feet of an occupied dwelling?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	9. Is the application submitted as a result of a Violation? NOV #
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	10. Is the application submitted as a result of other laws or regulations or policies? Explain: Per 3/16/01 Meeting.
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	11. Does the application affect the surface landowner or change the post mining land use?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	12. Does the application require or include underground design or mine sequence and timing? (Modification of R2P2?)
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	13. Does the application require or include collection and reporting of any baseline information?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	14. Could the application have any effect on wildlife or vegetation outside the current disturbed area?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	15. Does application require or include soil removal, storage or placement?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	16. Does the application require or include vegetation monitoring, removal or revegetation activities?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	17. Does the application require or include construction, modification, or removal of surface facilities?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	18. Does the application require or include water monitoring, sediment or drainage control measures?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	19. Does the application require or include certified designs, maps, or calculations?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	20. Does the application require or include subsidence control or monitoring?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	21. Have reclamation costs for bonding been provided for?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	22. Does application involve a perennial stream, a stream buffer zone or discharges to a stream?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	23. Does the application affect permits issued by other agencies or permits issued to other entities?

**X Attach 3 complete copies of the application.**

I hereby certify that I am a responsible official of the applicant and that the information contained in this application is true and correct to the best of my information and belief in all respects with the laws of Utah in reference to commitments, undertakings, and obligations, herein.

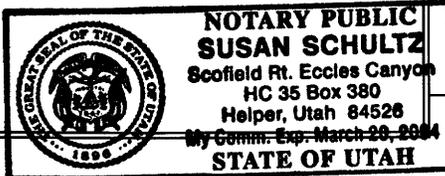
*Carol Hansen* Project Representative 8-2-02  
Signed - Name - Position - Date

Subscribed and sworn to before me this 2 day of Aug, 19 02

*Susan Schultz*  
Notary Public

My Commission Expires: \_\_\_\_\_  
Attest: STATE OF \_\_\_\_\_  
COUNTY OF \_\_\_\_\_

3-20-04  
*Utah*



Received by Oil, Gas & Mining  
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AUG 02 2002

DIVISION OF  
OIL, GAS AND MINING

ASSIGNED TRACKING NUMBER

