



STATE OF UTAH  
NATURAL RESOURCES  
Oil, Gas & Mining

Norman H. Bangerter, Governor  
Dee C. Hansen, Executive Director  
Dianne R. Nielson, Ph.D., Division Director

355 W. North Temple • 3 Triad Center • Suite 350 • Salt Lake City, UT 84180-1203 • 801-538-5340

September 22, 1986

Mr. Charles Durrett  
Sunedco Coal Company  
7401 West Mansfield Avenue  
Suite 418  
Lakewood, Colorado 80235

**FILE COPY**

Dear Mr. Durrett:

Re: Determination of Completeness, Soldier Canyon Mine,  
ACT/007/018, Folder No. 2, Carbon County, Utah

The Division has completed a Determination of Completeness (DOC) review on the material submitted August 8, 1986 by Soldier Creek Coal Company. The application cannot yet be determined complete, as a small number of deficiencies remain. The attached review document outlines these as well as outstanding technical deficiencies.

A prompt and complete response to this deficiency review will allow a notice of application to be published and a Draft Technical Analysis to be prepared. Please feel free to contact me or Susan C. Linner should you need clarification on any of the deficiencies.

Sincerely,

A handwritten signature in cursive script that reads "L. P. Braxton".

L. P. Braxton  
Administrator  
Mineral Resource Development  
and Reclamation Program

SCL:jvb  
cc: Tom Paluso, SCCC  
S. Linner  
B Team  
0028R-60

Determination of Completeness

Soldier Creek Coal Company  
Soldier Canyon Mine  
ACT/007/018  
Carbon County, Utah

September 22, 1986

DETERMINATION OF COMPLETENESS

UMC 782.13 Identification of Interests - DL

- (a)(3) It appears that in replacing page 2-3 the holders of record of any leasehold interest in the coal to be mined were inadvertently deleted. These must be reinserted into the application.
- (b)(3)(c) The names and addresses of principal shareholders and resident agents for Sunoco Energy Development Company, Resources Enterprises Inc. and Sunedco Coal Company have not been provided.

UMC 782.19 Identification of Other Licenses and Permits - SCL

The applicant has applied for a revised Air Quality Approval Order (AQAO) for the increased coal tonnage. When the final AQAO is received it must be made a part of the application.

UMC 783.19 Vegetation Information - LK

The applicant provided SCS documentation of range condition for only the Riparian reference area. Documentation of range condition must also be provided for the Mountain Brush reference area and the Shrub-Grass-Juniper reference area.

The applicant must describe how reference areas are marked in the field.

UMC 783.24-25 Maps: General Requirements, Cross Sections, Maps, and Plans - JRH

The applicant has not provided on the maps of the rock waste disposal and sewage lagoon areas, boundaries for the affected areas of those facilities and their respective areas. Map 5.1-2 as indicated on page 7-8 of the MRP does not include the disturbed area for the rock waste and sewage lagoon areas. A map similar to that of Exhibit 5.1-1 should be prepared for these areas showing the affected areas and those areas covered with the bond.

The applicant has not provided maps and drawings of the existing sediment pond for the mine site. The drawings provided in the MRP are those for the proposed modifications to the pond. Since the pond was modified this summer (1986), current drawings of the sediment pond as it exists are to be provided as part of the abatement plans for the modifications of the sediment pond. These maps and plans should replace any of the outdated maps that are currently in the proposed plan.

UMC 784.13 Reclamation Plan: General Requirements - JSL

- (b)(4) The ICR comment has been adequately addressed. However, this section is not complete. On page 5-21 (8/8/86 revision) the operator suggests that topsoil may be used in the embankment construction of the sediment pond at the waste rock disposal area. All topsoil must be removed. The Division recommends that the operator find an alternative material to construct the sediment pond embankment. The use of topsoil for embankment construction shall not be allowable unless the operator can show justification pursuant to UMC 817.22(b) or 817.22(g). On page 5-32 the operator states that regrading the embankment materials "by definition" will replace the topsoil materials. The Division agrees that the soil materials will be replaced, but the soil material would no longer be defined as topsoil. This is primarily due to the contamination of the topsoil with other soil materials.

UMC 784.14 Reclamation Plan: Protection of Hydrologic Balance - DC

- (c) This section is complete, but technical adequacy cannot be determined until results from the groundwater survey are submitted.

UMC 784.23 Operation Plan: Maps and Plans - RPS

- (g) Exhibit 3.2-3 still needs to be submitted to make the plan complete.

UMC 784.23 Operation Plan: Maps and Plans - JRH

A map showing the affected area and the respective acreages for the waste rock disposal area and the sewage lagoon area is not found in the MRP.

UMC 784.25 Return of Coal Processing Waste To Underground Workings - JRH

Section 4.2.8 indicates that sediment pond waste material shall be disposed of in the waste rock disposal facility or underground. Sediment pond waste has been determined by the Division to be treated as coal processing waste material. The operator must show that disposal of the sediment pond waste material will be in accordance with this section and UMC 817.88 as they apply. Due to the minimal amount of waste material that may be disposed of in underground workings, the operator shall only be required to commit to submit plans and receive approval by MSHA for underground sediment pond waste disposal. Sediment pond material placed in the waste rock disposal facility shall be subject to analysis and treatment as provided in the operator's plans for the waste rock disposal site. These commitments must be included in the plan in order to determine this section complete.

TECHNICAL DEFICIENCIES

UMC 817.15 Casing and Sealing of Exposed Underground Openings: Permanent - JRH

The operator states on page 5-4 of the MRP that portals shall be backfilled a minimum distance of 12 feet. In accordance with MSHA requirements, the minimum distance for backfilling of the portals shall be 25 feet. The operator shall revise the MRP accordingly. Figure 5.2-1 should also be revised to indicate 25 feet minimum backfill. The operator shall submit detailed design drawings and specifications for sealing the shafts. These designs shall be subject to approval by MSHA and the Division upon permanent closure of the openings.

UMC 817.46 Hydrologic Balance: Sedimentation Ponds - JRH

Page 4-15 of the MRP indicates that the waste rock sediment pond will have inslopes of 2.5:1 and outslopes of 2:1. This exceeds the combined inslope and outslope requirements of 5:1 as required under part (m) of this section. The central facilities pond is also in excess of the 5:1 combined slope criteria. The operator shall revise designs or provide calculations proving the stability of the waste rock sediment pond. The operator shall revise the MRP where changes are required due to the revisions and modifications to the central facilities sediment pond. The cross reference as provided in section 7 of the MRP needs to be revised regarding the hydrology section and the sedimentation pond. Locations indicated in the cross reference do not support the required information for these sections. Remarks in the cross reference also need to be revised to reflect changes made in the MRP.

UMC 817.88 Coal Processing Waste: Return to Underground  
Workings - JRH

Refer to comments made under UMC 784.25.

UMC 817.97 Protection of Fish, Wildlife and Related Environmental  
Values - LK

The applicant must provide adequate mitigation for loss of critical deer winter range that will be affected by the 20.2 acres of disturbance due to the waste rock disposal site. This should be in the form of chaining or other habitat improvement in the general area of sufficient acreage so as to replace the production lost during operation of the disposal site. It may require 2-3 acres of improvement to compensate for each acre of disturbance. This could also be a phased program compensating the production loss as it occurs (i.e. if only 3 acres are disturbed the first year, then mitigation would only be needed for 3 acres instead of the total 20.2 acres).

UMC 817.99 Slides and Other Damage - JRH

Section 4.4.1 as referenced in the MRP does not contain a commitment by the operator to notify the Division by the fastest possible means in the event when slides or other damage which may have a potential adverse effect on public property, health, safety or the environment. This commitment should be provided in the MRP.

0910R