

# SC<sup>3</sup> SOLDIER CREEK COAL CO.

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August 8, 1989

RECEIVED  
AUG 15 1989DIVISION OF  
OIL, GAS & MINING

Ms. Susan C. Linner  
Permit Supervisor  
Division of Oil, Gas & Mining  
355 West North Temple  
3 Triad Center, Suite 350  
Salt Lake City, UT 84180-1203

Re: Deficiency Response - Permit Amendment  
Surface Facility Amendment  
Soldier Canyon Mine, ACT/007/018

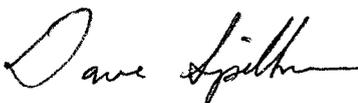
Dear Ms. Linner:

Enclosed are thirteen (13) complete copies of Soldier Creek Coal Company's response to the Division's July 11, 1989 deficiency review. Each specific deficiency is addressed and all modifications and/or additional information is formatted for direct incorporation into the MRP.

Please contact me if you have any questions or need additional information.

Sincerely,

SOLDIER CREEK COAL COMPANY



D.G. Spillman  
Mine Engineer

Enclosures  
DGS:pp

Deficiency Response  
Permit Amendment - Surface Facilities Expansion

Soldier Creek Coal Company  
Soldier Canyon Mine  
ACT/007/018

UMC 817.42 Hydrologic Balance: Water Quality Standards and Effluent Limitation - MMD

The drainage control facilities have been revised to include the topsoil drainage (Exhibit 10.2.4-1). Please note that the original runoff calculations for the proposed portal expansion utilized an area 2.58 acres (Appendix A). This acreage included the topsoil area, therefore the submitted runoff parameters remain valid.

UMC 817.43 Hydrologic Balance: Diversions and Conveyance of Overland Flow, Shallow Ground Water Flow, and Ephemeral Streams - MMD

Drawing D-265 has been replaced by Drawing D-268, (Disturbance/Runoff Map) and Exhibit 10.5.3-1, (Typical Runoff Diversion Cross Section Adjacent to County Road) has been added to provide additional runoff diversion detail. The new drawings propose that 24" half round culverts to be installed where berms were previously proposed.

Page one of Appendix C incorrectly stated that the undisturbed drainage diversion was a "permanent diversion". This has been revised to read "temporary diversion". Also, runoff design calculations within Appendix C have been revised to utilize a curve number of 75 which is consistent with the approved MRP. Furthermore, the undisturbed drainage diversion designed during the preliminary analysis remains valid for the present facility design.

UMC 817.44 Hydrologic Balance: Stream Channel Diversions - MMD

The Applicant has revised the outlet design of stream channel culvert to include the installation of roughness rings (design details are presented in Appendix D). The lower exit velocities at the culvert outlet now eliminate the need for the previously proposed splash basin energy dissipator and associated stream channel disturbance. Page 10-32 has also been revised to indicate that any future design changes shall receive Division approval.

UMC 817.45 Hydrologic Balance: Sediment Control Measures - MMD

Pages 10-20 and 10-34 have been revised to provide additional sediment control details for construction and reclamation activities.

UMC 817.46 Hydrologic Balance: Sediment Ponds - MMD

UMC 817.49 Hydrologic Balance: Permanent and Temporary Impoundments - MMD

A commitment to maintain the water level in the pond, at or below the decant elevation has been added to page 10-32.

UMC 817.47 Hydrologic Balance: Discharge Structures - MMD

Riprap similar to that described for the spillway outlet was also installed at the decant outlet during the initial sedimentation pond construction. The future as-built drawing, required following the implemented modifications, shall detail the existing riprap.

UMC 817.57 Hydrologic Balance: Stream Buffer Zones - MMD

A detailed reclamation stream channel design has been added as Appendix F. Page 10-22 has also been revised.

UMC 784.13 Reclamation Plan: General Requirements - LK

(b) (4) - Pages 10-8 and 10-38 have been revised to eliminate the woody species from the proposed topsoil stockpile revegetation plan.

(b) (5) and (b) (5) (V) - Page 10-21 has been revised to reference riparian revegetation, intermediate revegetation and pest and/or disease control. Also, Exhibit 10.3.6-1 (Proposed Riparian Reclamation Areas), has been added to the submittal.

UMC 784.21 Fish and Wildlife Plan

Page 10-17 has been revised and Illustrations 10.2.8-1 & 10.2.8-2 have been added, to detail wildlife mitigation associated with the Soldier Canyon Mine.

UMC 783.21 Soil Resources Information - JSL

Page 10-1 indicates that the surface expansion shall be located on "previously undisturbed land". This was a typographical error and has been corrected to read "previously disturbed land".

UMC 783.14 (a) (1) (iii) Geology Description - JSL

Test results of representative overburden and underburden samples have now been completed and incorporated into the submittal. Analyses show the material to be non-toxic and non-acid forming.

UMC 817.23 Topsoil: Storage - JSL

Additional information concerning topsoil stockpile protection has been added to page 10-8 and Exhibits 10.1.1-1 & 10.2.4-1.

UMC 817.24 Topsoil: Redistribution - JSL

Page 10-39 has been revised to state that the average soil redistribution shall be one foot.

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

Drawings D-256 and D-264 have been replaced by Drawings D-267 and D-268 respectively.

UMC 784.18 Relocation or Use of Public Roads - JRH

A building permit from Carbon County is required for construction of the surface facilities. As presented in Illustrations 10.2.3-1 and 10.2.3-2, Carbon County tentatively approves of the facility expansion, however, issuance of the required building permit is subject to their review and approval of the detailed design plans.

UMC 784.19 Underground Development Waste - JRH

Test results of representative overburden and underburden samples have now been completed (Illustration 10.2.6-2). Analyses show the material to be non-toxic and non-acid forming.

In the event that unsuitable and/or excess fill material is generated during the 1989 construction season, this material shall be temporarily stockpiled at the central mine facilities within the approved disturbed area. Permitting would then be finalized for the waste rock disposal site currently incorporated within the MRP, such that this site would be available to receive material during the 1990 construction season.

UMC 784.24 Transportation Facilities - JRH

As indicated on Illustration 10.2.6-1a, an Air Quality Approval Order is not necessary for site preparation, building construction, foundation pouring, etc. An Air Quality Approval Order is however, required prior to placing the coal handling facilities into operation.

The proposed facility changes (i.e. the elimination of open coal storage and the addition of a concrete silo coal storage) have been presented to Bureau of Air Quality. They see no potential problems granting approval subject to their review of the final design details.

UMC 800 - Bonding and Insurance - JRH

Norwest Resource Consultants, Inc., have recently been contracted to evaluate the proposed facility expansion and provide the final engineering details necessary for construction. Accurate bonding calculations can not be provided until final details are complete.

Therefore, Soldier Creek Coal Company requests approval of the facilities expansion, with the stipulation that specific bonding calculations be redetermined following completion of the engineering design. This request is based on the fact that sufficient excess bonding now exists to provide coverage during this interim period (i.e. 20.2 acres at the proposed waste rock disposal area are bonded yet remain undisturbed).

UMC 817.13, 14 & 15 Casing and Sealing of Exposed Underground Openings - JRH

Section 10.3.2 (pg. 10-19, last paragraph) references Section 5.2 (Sealing of Mine Openings) contained in the approved MRP.

UMC 817.101 Backfilling and Grading: General Requirements - JRH

Specific material balance information has been provided by revising Table 10.3.8-2. This information is provided for the surface facilities expansion area only (east side of county road), and indicates a slight deficit for reclamation fill.

Norwest Resource Consultants, Inc., have recently been contracted to provide the final engineering details necessary for construction. Based on their preliminary engineering, the proposed coal handling and storage facilities have changed from a stacking tube with open storage to an enclosed concrete silo (Exhibit 10.1.1-1). This facility modification would now utilize the east side of the county road for mine yard storage and virtually eliminate the need to excavate the proposed mine yard expansion (west side of county road). Additional specific information on material balance shall be provided in conjunction with Norwest's detailed engineering plans.