007/018 #2

0014

SC3 SOLDIER CREEK COAL CO.

Telephone (801) 637-6360

P.O. Box I
Price, Utah 84501

July 28, 1992

RECEIVED
JUL 31 1992
DIVISION OF
OIL GAS & MINING

Daron R. Haddock
Permit Supervisor
Division of Oil, Gas and Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

RE: Deficiency Response for #3 Fan Exploration Site
ACT/007/018

Dear Daron:

I have enclosed two copies of my response to your deficiency letter dated June 26, 1992. The required additional copies of this submittal will be provided following your approval.

All concerns outlined in your June 26, 1992 letter have now been addressed, with the following exceptions:

- A commitment to install a silt fence along the toe of the road fill slope has not been made. This is due to the limiting site characteristics which make the installation and maintenance of such a structure impractical. This was verified by Rick Summers during his March 27, 1992 mine site visit and reaffirmed during my July 2, 1992 telephone conversation with him.

- The straw bales and/or silt fences proposed for placement within the county road shoulder drainage ditch were proposed in conjunction with our spring reseeding plan. These structures are not recommended for placement during our proposed fall reseeding. This is due primarily to the fact that they will be destroyed during routine snow removal operations along the county road.

  A fair amount of natural revegetation has become established on the road out-slope this year. It is proposed that "pock marking" operations be limited on the road out-slope in an effort to preserve the natural revegetation. This existing vegetation, coupled with reseeding and hydromulching should provide adequate sediment control.

- *The referenced sediment basin design by Edward A. Hansen has not been incorporated into the MRP. This was acknowledged by Sharon Falvey during our July 23, 1992 telephone conversation since a copy of said reference is available for review in DOGM's office.*

- *The commitment to submit a complete permit amendment for the fan site or proceed with final reclamation has been proposed for the Fall of 1994 rather than the Fall of 1993. This is as per our July 22, 1992 telephone conversation.*

  My January 20, 1992 submittal to DOGM, which originally proposed the Fall of 1993 deadline, was written at a time when it was believed the sale of the mine would be consummated by March 31, 1992. This would have allowed the new owner a reasonable amount of time to reassess mine plans and ventilation needs. Since negotiations are presently continuing for the sale of the mine, it now appears that the Fall of 1993 deadline will not afford the new owner ample time to evaluate mining and ventilation modifications.

  Soldier Creek Coal Company also believes that revegetation success (or lack of success) will play an important role for future compliance, permitting and reassessment of the proposed fan site. Since DOGM was unable to provide a timely authorization, to proceed with our spring revegetation plan, one potentially successful growing season has been lost. It has also been observed, that a minimum of two growing seasons are required to judge the success of reseeding operations at the mine site. Again, the 1994 deadline would be more appropriate when considering the interim revegetation and stabilization work planned for this fall.

Please contact me if you have any questions or comments concerning this matter. Your cooperation in completing this permit revision will be appreciated.

Sincerely,

SOLDIER CREEK COAL COMPANY

Dave Spillman

David G. Spillman
Mine Engineer

DGS:dmo

Enclosures

cc: SC3 Central File-w/enclosures