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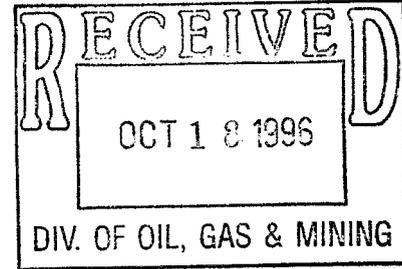


**Coastal**  
The Energy People

007/018 #2

October 17, 1996

Daron Haddock  
Permit Supervisor  
Utah Division of Oil, Gas & Mining  
Box 145801  
Salt Lake City, Utah 84114-5801



Re: Soldier Creek Coal Company, Second Incidental Boundary Change, Response to Deficiencies, ACT/007/018-96A

Dear Mr. Haddock:

The following concerns were expressed in recent telephone conversations with you regarding the above referenced permit amendment. The following are our responses to those concerns.

It was requested that a legal description of the proposed incidental boundary change (IBC) be submitted for insertion into the permit rather than just in the cover letter for this IBC amendment. A review of the R645 regulations failed to locate a requirement that the permit contain a legal description of the permit area. However, we can see the value of such a description being in the permit for the use of the Division. Since such a description at this point would be valid for only a short period of time and because the description will change significantly with the approval of the Alkali Tract Significant Revision, we respectfully request that a legal description of the permit area for this amendment not be submitted at this time. We hereby commit to submit, as a stipulation, a legal description of the revised permit area as part of the Soldier Canyon Mine permit renewal, which has also been submitted. We believe that this action will reduce the possibility for confusion and reduce the amount of review required since the permit boundary is in a state of change. The description of the boundary proposed to be submitted in the permit renewal should remain unchanged for an extended period of time. All of the maps submitted with this IBC amendment have been revised to show the currently approved boundary, including the first IBC. These revised maps are hereby submitted for replacement in this amendment.

Inconsistencies between the current permit text and the IBC amendment maps previously submitted are corrected for this amendment by the maps submitted herewith showing the currently approved permit boundary. These inconsistencies will apply to the Alkali Tract Significant Revision but no longer apply to this corrected amendment.

Subsidence monitoring site number 120 was added to Exhibit 5.25-1. This site will be installed prior to mining beneath it, and it will be monitored according to the plan described in the current

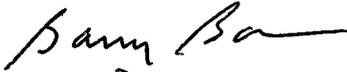
**Utah Fuel Company**

A SUBSIDIARY OF THE COASTAL CORPORATION  
P O BOX 719 • HELPER UT 84526-0719 • 801/637-7925 • FAX 801/637-7929 • SALT LAKE 801/596-7111

permit. Visual monitoring for the effects of subsidence will also be employed as described in the permit.

Forms C1 and C2 are attached. Six copies of revisions for this amendment are enclosed and one copy is being forwarded to Peter Hess at the Price Field Office. Thank you for your help in expediting the review of this amendment. If there are questions or additional comments please contact Barry Barnum at 636-2669.

Very truly yours,



for

Rick Olsen

Vice President and General Manager

Soldier Creek Coal Company

# APPLICATION FOR PERMIT CHANGE

Title of Change: **Soldier Creek Coal Company Incidental Boundary Change #2**

Permit Number: **ACT/007/018**

Mine: **Soldier Canyon Mine**

Permittee: **Soldier Creek Coal Company**

Description, include reason for change and timing required to implement: **Conditions in existing IBC require additional mining area pending approval of Alkali Revision**

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	1. Change in the size of the Permit Area?    186    acres <input checked="" type="checkbox"/> increase <input type="checkbox"/> decrease.
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	2. Change in the size of the Disturbed Area?                      acres <input type="checkbox"/> increase <input type="checkbox"/> decrease.
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	3. Will permit change include operations outside the Cumulative Hydrologic Impact Area?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	4. Will permit change include operations in hydrologic basins other than currently approved?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	5. Does permit change result from cancellation, reduction or increase of insurance or reclamation bond?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	6. Does permit change require or include public notice publication?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	7. Permit change as a result of a Violation?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	8. Permit change as a result of a Division Order?    D.O.#
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	9. Permit change as a result of other laws or regulations?    Explain:
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	10. Does permit change require or include ownership, control, right-of-entry, or compliance information?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	11. Does the permit change affect the surface landowner or change the post mining land use?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	12. Does permit change require or include collection and reporting of any baseline information?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	13. Could the permit change have any effect on wildlife or vegetation outside the current disturbed area?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	14. Does permit change require or include soil removal, storage or placement?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	15. Does permit change require or include vegetation monitoring, removal or revegetation activities?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	16. Does permit change require or include construction, modification, or removal of surface facilities?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	17. Does permit change require or include water monitoring, sediment or drainage control measures?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	18. Does permit change require or include certified designs, maps, or calculations?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	19. Does permit change require or include underground design or mine sequence and timing?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	20. Does permit change require or include subsidence control or monitoring?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	21. Have reclamation costs for bonding been provided or revised for any change in the reclamation plan?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	22. Is permit change within 100 feet of a public road or perennial stream or 500 feet of an occupied dwelling?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	23. Is this permit change coal exploration activity <input type="checkbox"/> inside <input type="checkbox"/> outside of the permit area?

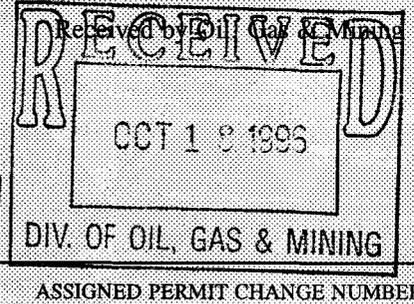
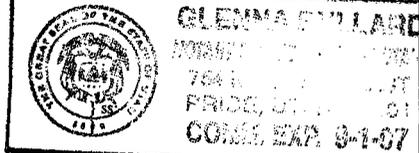
**X Attach 7 complete copies of proposed permit change as it would be incorporated into the Mining and Reclamation Plan.**

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.

*Rick Olsen*, ENV. ENG., 10/17/96  
 Signed - Name - Position - Date **FOR RICK OLSEN**

Subscribed and sworn to before me this 17<sup>th</sup> day of Oct, 19 96.  
*Glenna Bullard*  
 Notary Public

My Commission Expires: 9-1, 19 99  
 Attest: *Utah*  
 COUNTY OF *Carbon*



ASSIGNED PERMIT CHANGE NUMBER

