

0018

### Document Information Form

Mine Number: C/007/018

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To: DOGM

From:

Person N/A

Company N/A

Date Sent: August 8, 1996

Explanation:

Administrative Completeness Review Worksheet

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\_\_\_\_\_

cc:

File in: C/007, 018, Internal

Refer to:

- Confidential
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Date \_\_\_\_\_ For additional information

**ADMINISTRATIVE COMPLETENESS REVIEW WORKSHEET  
(R645-301-150)**

DATE: August 8, 1996  
aker, Bob Davidson, Jim Smith

REVIEWER(S): Steve Johnson, Wayne Western, Paul

APPLICANT: Soldier Creek Coal Company

LINE NAME: Soldier Canyon Alkali Lease

FILE NO. ACT/007/018-96 -1

**"Administratively Complete Application"** means an application for permit approval or approval for coal exploration, where required, which the Division determines to contain information addressing each application requirement of the State Program and to contain all information necessary to initiate processing and public review.

*Folder # 2*

**Directions:** The categories listed below correspond to the minimum requirements for information necessary to initiate processing and public review. If a category is checked the Applicant has met the Completeness requirement for that category. If a category is not checked, the Completeness requirements have not been met. The comments column will identify the deficiency and what is necessary to correct it.

**Comments**

301-112	Identification of Interests	_____	
100	Applicant's Business Structure	<u>✓</u>	
210	Applicant's Name/Address/Phone	<u>✓</u>	
220	Resident Agent's Name/Address/Phone	<u>✓</u>	<i>Not given</i>
230	Name/Address/Phone of AML Fees Payer	<u>✓</u>	<i>Not given</i>
300	Corporate Structure & Ownership	<u>✓</u>	File in:
400	Identify Other Mining Operations in US	<u>✓</u>	Refer to Record No <u>0018</u> Date <u>8-8-96</u> In C/ <u>007</u> , <u>018</u> , <u>Internal</u> For additional information
500	Surface & Mineral Ownership	_____	<i>Incomplete</i>

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400	Identify Other Mining Operations in US	<u>✓</u>	
500	Surface & Mineral Ownership	_____	<u>Incomplete</u>

Comments

600	Ownership Contiguous to Permit	_____	Incomplete
700	MSHA Numbers	<u>✓</u>	<del>Not given</del>
800	Interest in Contiguous Lands	<u>✓</u>	<del>Not given</del>

301-113	Violation Information	<u>✓</u>	
100	Suspension or Revocation Information	<u>✓</u>	
300	List of Violations - 3 Previous Years	<u>✓</u>	Needs to be updated

301-114	Right of Entry	_____	Incomplete
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301-115	Status of Unsuitability Claims	<u>✓</u>	Needs more information
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301-116	Permit Term	<u>✓</u>	
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Comments

301-117	<p>....Insurance <input checked="" type="checkbox"/></p> <p>....Proof of Publication <input checked="" type="checkbox"/></p> <p>....Facilities and Structures Used in Common <input checked="" type="checkbox"/></p>	<p>To be submitted after publication</p>
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301-118	<p>Filing Fee <input checked="" type="checkbox"/></p>	
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Comments

301-123	<p>Notarized Signature of Responsible Official <input checked="" type="checkbox"/></p>	
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301-130	<p><b>Information Collection: Technical Data Accompanied by Names of Persons or Organizations that Collected and Analyzed the Data - Dates of Collections - and Analysis of the Data and Description of the Methodology Used to Collect and Analyze Data</b></p>	<p>Can't determine without receiving additional information associated with break outs</p>
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301-200	<p>Soils <input type="checkbox"/></p>	<p>Incomplete (See Bobs Memo dated July 17, 1996)</p>
211	<p>Description of Premining Soil Resources <input type="checkbox"/></p>	

Comments

221	Prime Farmland Investigation _____	
222	Soil Survey _____	
224	Substitute Topsoil Info (When Proposed) _____	
230	Operation Plan: Topsoil Handling/Removal/Storage _____	
240	Reclamation Plan: Soil Redistribution/Stabilization _____	

Comments

301-300	Biology _____	
320	Vegetation Information _____	No information about breakout area planned for 1996
322	Fish and Wildlife Information <u>✓</u>	
323	Maps/Photos: Vegetation-Fish-Wildlife Areas <u>✓</u>	

Comments

330	Operation Plan: Vegetation-Fish-Wildlife Protection <u>✓</u>	
341	Reclamation Plan for Revegetation <u>✓</u>	Cannot evaluate reclamation plan w/o baseline information
342	Fish & Wildlife Plan for Reclamation Phase <u>✓</u>	

301-400	Land Use and Air Quality <u>✓</u>	
411	Pre-Mining Land Use Information (Includes Cultural Resources) <u>✓</u>	
412	Post-Mining Land Use Information <u>✓</u>	

Comments

301-500	Engineering <u>WFW</u>	
510 and 520	General Description of Operation Plan: (Maps, Locations, Cross-Sections, Narrative, Descriptions & Calculations) <u>WFW</u>	
522	Coal Recovery Description <u>WFW</u>	
523	Mining Methods <u>WFW</u>	

Comments

524	Blasting and Explosives Plan	<u>W/W</u> <u>NA</u>	NA
525	Subsidence Control Plan	<u>W/W</u> <u>NA</u>	NA
526	Mine Facilities Description (Narrative, Plans, Maps) Including Existing Structures & Support Facilities	<u>W/W</u> <u>NA</u>	NA
527	Transportation Facilities (Including Plans & Maps)	<u>W/W</u> <u>NA</u>	NA
528	Coal Mine Waste Plans (Description & Designs)	<u>W/W</u> <u>NA</u>	NA
529	Management of Mine Openings (Design)	<u>W/W</u> <u>NA</u>	NA
531	General Plans for Structures	<u>W/W</u> <u>NA</u>	NA
532	Sediment Control	<u>W/W</u> <u>NA</u>	NA
533	Impoundments	<u>W/W</u> <u>NA</u>	NA

Comments

301-534	Roads (Plans, Drawings, Designs, & Specifications)	<u>W/W</u> <u>NA</u>	NA
535	Spoil	<u>W/W</u> <u>NA</u>	NA
536	Coal Mine Waste	<u>W/W</u> <u>NA</u>	NA

Comments

537	Regraded Slopes	<u>WHW</u> <u>NA</u>	NA
540 541-542	Reclamation Narrative, Maps and Plans	<u>WHW</u> <u>NA</u>	NA
551	Casing and Sealing: Underground Openings	<u>WHW</u> <u>NA</u>	NA
553	Backfilling and Grading Description	<u>WHW</u>	NA

301-600	Geology	_____	
621	Description of Geology (Permit & Adjacent Area)	_____	
622	Geologic Cross-Sections, Maps, and Plans	_____	
630	Plans for Casing and Sealing Holes	_____	

Comments

301-700	Hydrology	<u>SMTJ</u>	
721	Description of Hydrologic Resources: (Permit and Adjacent Area)	<u>SMTJ</u>	

Comments

722	Cross-Sections and Maps: Subsurface Water - Surface Water - Monitoring Stations - Wells SMTJ	
723	Sampling and Analysis SMTJ	
724	Baseline Information: Ground Water - Surface Water - Geology - Climatological & Supplemental; If Needed SMTJ	
728	PHC Determination SMTJ	
730	General Operation Plan: Minimize Disturbance to Hydrologic Balance & Compliance with Clean Water Act SMTJ	
731	Ground and Surface Water Protection SMTJ	
732	Ground and Surface Water Monitoring SMTJ	

Comments

301-740	<b>Plans and Designs: Operation and Reclamation Plan</b> <b>Sediment Control Measures</b>	<u>N/A</u>	
	....Siltation Structures	<u>N/A</u>	
	....Sediment Ponds	<u>N/A</u>	
	....Other Treatment Facilities	<u>N/A</u>	
	....Diversions	<u>N/A</u>	
	....Road Drainage	<u>N/A</u>	
	....Impoundments	<u>N/A</u>	
	....Discharge Structures	<u>N/A</u>	
	....Disposal of Excess Spoil	<u>N/A</u>	
	....Coal Mine Waste	<u>N/A</u>	
	....Disposal of Non-Coal Mine Waste	<u>N/A</u>	
	....Casing and Sealing of Wells	<u>N/A</u>	

Comments

301-800	Bonding and Insurance _____	Need breakout info,
820	Applicant: Have Adequate Bond at Permit Issuance _____	
830	Bond Estimate and Calculations Provided _____	
890	Certificate of Insurance Provided _____	

302-200	Special Categories of Mining <u>DR7</u>	NA
210	Experimental Practices Mining <u>DR7</u>	NA
220	Mountaintop Removal Mining <u>DR7</u>	NA
230	Steep Slope Mining <u>DR7</u>	NA
240	Auger Mining <u>DR7</u>	NA
250	In Situ Processing Activities <u>DR7</u>	NA

Comments

302-260	Coal Processing Plants (Not Located Within Permit Area of Mine)	<u>NR7A</u>	NA
270	Variances From Approximate Original Contour Restoration Requirements	<u>NR7A</u>	NA
280	Variances for Delay in Contemporaneous Reclamation Requirement in Combined Surface and Underground Coal Mining Activities	<u>NR7A</u>	NA
290	Small Operator Assistance Program (SOAP)	<u>NR7A</u>	NA

302-300	Special Areas of Mining	<u>NR7A</u>	NA
301	Prime Farmland	<u>NR7A</u>	Underground extension. No Farmland affected
302	Alluvial Valley Floors	<u>NR7A</u>	No Alluvial Valley Floors affected.



**State of Utah**  
 DEPARTMENT OF NATURAL RESOURCES  
 DIVISION OF OIL, GAS AND MINING

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July 17, 1996

TO: File

THRU: Daron Haddock, Permit Supervisor

FROM: Robert Davidson, Soils Reclamation Specialist *RAD*

RE: Administrative Completeness Review, Alkali Tract Significant Revision, Coastal States Energy Company, ACT/007/018, Folder #2, Carbon County, Utah

**SYNOPSIS**

The Significant Permit Revision package was received from Coastal States Energy Company on March 31, 1996 for the Alkali Tract proposal. This document supplies the Administrative Completeness Review for soils analysis, section R645-301-200.

**TECHNICAL ANALYSIS**

**Directions:** The categories listed below correspond to the minimum requirements for information necessary to initiate processing and public review. If a category is checked the Applicant has met the Completeness requirement for that category. If a category is not checked, the Completeness requirements have not been met. The comments column will identify the deficiency and what is necessary to correct it.

		Comments
301-200	Soils —	No soil environmental resource information provided for the planned surface disturbance associated with two separate breakouts identified in the lease expansion area.
211	Description of Premining Soil Resources —	
221	Prime Farmland Investigation —	



222	Soil Survey	—	
224	Substitute Topsoil Info (When Proposed)	—	
230	Operation Plan: <b>Topsoil Handling/Removal/Storage</b>	—	No topsoil handling/removal/storage information provided for the planned surface disturbance associated with two separate breakouts identified in the lease expansion area.
240	Reclamation Plan: <b>Soil Redistribution/Stabilization</b>	—	No soil redistribution/stabilization information provided for the planned surface disturbance associated with two separate breakouts identified in the lease expansion area.

## RECOMMENDATIONS

The only soil resource information provided the Revision document is Exhibit 2.22-1, Soil Resource Map for the Soldier Canyon Mine. The map is taken directly from the Order-3 Carbon County soil survey published by the U.S. Department of Agriculture, Soil Conservation Service. Generally, the Order-3 survey information would be sufficient for lease expansions not involving any surface disturbance. However, the Alkali Creek tract lease expansion involves two separate breakouts as located on Exhibit 5.21-5. The first breakout is labeled as 1996 West Mains. The second is labeled 1999 First Mining. Since both breakouts will result in localized surface disturbance, information in the plan needs to include specific Order-1 soil survey/soil resource, operation and reclamation plan information for those surface areas directly affected. Since no new soil information is provide for the proposed breakouts and resulting surface disturbance areas in the lease expansion area, the Significant Permit Revision package is not complete.

MBB

## IDENTIFICATION OF INTERESTS

Regulatory Reference: R645-301-112

### Analysis:

Normally, the Division would rely on much of the information in the current mining and reclamation plan for information required to be in this section of the plan or application. However, it appears the updated information is intended to supersede what is now in the plan. Therefore, it is not complete. The application does not show the person responsible for paying the abandoned mine reclamation fee, and it does not show the resident agent.

The application is required to contain the names and addresses of all owners of record of surface and mineral property both within and contiguous to the proposed permit area. Revised Map 1.12-1 shows surface ownership in the current and proposed permit area and includes contiguous areas. However, the plan does not include addresses for all entities owning surface property within and contiguous to the proposed permit area.

The mineral ownership information needs to be revised. According to the plan, the only legal or equitable owners of the coal to be mined are the United States government, the State of Utah, and Sage Point Coal Company. These and Louise Iriart are the owners of coal contiguous to the proposed permit area.

The applicant needs to differentiate between mineral owners and lessees. Where the applicant has a right to enter and begin mining operations, it is assumed the applicant either owns or leases the coal. The applicant leases coal from governments entities, but the plan and application do not show who actually owns the mineral rights in areas with fee coal. For example, on page 1-90, the current application says, “. . . all coal reserves in the state of Utah formerly owned or leased by Sunedco are now owned or leased by Sa[g]e Point Coal Company.” This statement does not show clearly who owns the mineral rights. The application needs to show who owns the coal in these areas.

In the application, the bond forfeiture list ends on page 1-68, but in the current plan, information from a new section after the bond forfeiture list begins on page 1-61. The application and the plan need to be paginated so they do not overlap.

MSHA numbers are shown in Section 1.12.7 of the current plan, but this is a portion of the current plan that overlaps with the application. The plan contains a statement of all lands, interest in lands, options, or pending bids on interests held or made by the applicant for lands contiguous to the area. Again, however, this page overlaps with a page in the application.

### Findings:

Information provided in the proposal does not meet all of the minimum regulatory requirements of this section. Prior to final approval, the applicant must provide the following:

1. The application needs to show the names and addresses of all owners of record of surface and mineral property within and contiguous to the proposed permit area.
2. The application needs to be formatted in a way that does not supersede essential information in the current plan. Some pages in the application would overlap with the current plan and eliminate some needed information.

## **RIGHT OF ENTRY**

Regulatory Reference: R645-301-114

The current plan shows right of entry information for the existing and most of the proposed permit areas. A portion of Section 9, Township 13 South, Range 11 East, is shown as being within the proposed addition to the permit area. This area is already within the permit area for Andalex Resources, Inc., permit number ACT/007/019. Andalex's plan shows they acquired right of entry for this area. According to information received by telephone from a representative of Soldier Creek, Andalex does have the rights to mine this coal. Therefore, it needs to be deleted from Soldier Creek's proposed permit area.

Most of Section 32, Township 12 South, Range 12 East, is currently in the permit area. Based on the maps received with the application for the Alkali Creek permit revision, it appears the applicant intends to delete this section from the permit area.. However, according to annual reports, Soldier Creek mined about 5.6 acres within this section in 1992 and 1993. The regulations do not appear to address the issue of deleting a portion of an underground mine from a permit area. Logically, the Division should ensure that all commitments relative to subsidence monitoring and water monitoring, particularly any underground water monitoring, have been fulfilled for the area. The Division should also make a finding that no further monitoring is needed. Because the portion of this section that was mined is relatively small and because it was not second-mined, it should be possible to make these findings.

### **Findings:**

Information provided in the proposal does not meet all of the minimum regulatory requirements of this section. Prior to final approval, the applicant must provide the following:

1. For the portions of Section 9, Township 13 South, Range 11 East, shown as being in the proposed permit area, the applicant needs to either show it has the right to enter and begin mining and reclamation operations or delete this area from the proposed permit area.

In addition, the applicant has proposed deleting a portion of the permit area. Before

deleting this area, the Division needs to ensure that all appropriate monitoring and other requirements have been met.

## **VEGETATION INFORMATION**

Regulatory Reference: R645-301-321

### **Analysis:**

The application is primarily for underground mine development for which no additional vegetation information is required. The applicant has committed to take aerial photographs to monitor the effects of underground mining on vegetation. This commitment was made primarily to fulfill the requirements of a stipulation in the federal coal leases.

According to Exhibit 5.21-5, the mine plan for the Rock Canyon Seam, a breakout is planned for 1996 and another for 1999. Since the first of these breakouts is planned for within the current permit term, the application needs to contain vegetation information about this proposed disturbance. It is probably possible to correlate the vegetation community of the area that would be disturbed with a vegetation community already described in the mining and reclamation plan. This might be done by discussing the soil type and range site associated with the area that would be disturbed and showing they are similar to what is described in the plan. If the area that would be disturbed is in a completely different community, a full set of vegetation cover, density, and productivity information could be required.

The applicant should plan to include in the permit renewal package vegetation information needed for the planned 1999 breakout.

### **Findings:**

Information provided in the proposal does not meet all of the minimum regulatory requirements of this section. Prior to final approval, the applicant must provide the following:

1. The application needs to include information about the vegetation in the area of the planned 1996 breakout. This could be in the form of information that would correlate vegetation at the breakout site with vegetation at the main mine facilities.