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Received 9/27/16  
C/007/0033  
Task ID #5279

September 16, 2016

Mr. Daron Haddock  
Utah Division of Oil, Gas & Mining Coal Program  
1594 West North Temple, Suite 1210  
Salt Lake City, Utah 84116

Dear Mr. Haddock:

Subject: Intermountain Power Agency - Permit Change for Chapter 1  
Wildcat Loadout Facility, C/007/0033

Intermountain Power Agency is submitting a revision to Chapter 1 of our permit to alter the inspection schedule of the wind-blown fines. This is to reflect that the Wildcat Loadout is idle.

An electronic copy of all submittal materials have been sent to the Utah Division of Oil, Gas & Mining Coal Program via email to [ogmcoal@utah.gov](mailto:ogmcoal@utah.gov) on September 16, 2016. A hard copy will not be sent unless requested.

If you have any comments or questions, please contact me at (213) 367-4347.

Sincerely,



Aaron Perlman  
Project Manager  
Intermountain Power Project

AP:ln

**Delivery via Email**

cc: Mr. R. Dan Eldridge  
Intermountain Power Agency  
Mr. Bradford L. Packer  
Mr. William W. Engels  
Mr. John L. Aguilar

## APPLICATION FOR COAL PERMIT PROCESSING

Permit Change  New Permit  Renewal  Exploration  Bond Release  Transfer

Permittee: INTERMOUNTAIN POWER AGENCY

Mine: WILDCAT LOADOUT

Permit Number: C/007/0033

Title: REVISION TO APPENDIX P - COAL FINES MONITORING

Description, Include reason for application and timing required to implement:

**REDUCE QUARTERLY COAL FINE MONITORING TO ANNUALLY DUE TO INACTIVITY AND IDLE STATE OF FACILITY**

**Instructions:** If you answer yes to any of the first eight questions, this application may require Public Notice publication.

- Yes  No 1. Change in the size of the Permit Area? Acres: \_\_\_\_\_ Disturbed Area: \_\_\_\_\_  increase  decrease.
- Yes  No 2. Is the application submitted as a result of a Division Order? DO# \_\_\_\_\_
- Yes  No 3. Does the application include operations outside a previously identified Cumulative Hydrologic Impact Area?
- Yes  No 4. Does the application include operations in hydrologic basins other than as currently approved?
- Yes  No 5. Does the application result from cancellation, reduction or increase of insurance or reclamation bond?
- Yes  No 6. Does the application require or include public notice publication?
- Yes  No 7. Does the application require or include ownership, control, right-of-entry, or compliance information?
- Yes  No 8. Is proposed activity within 100 feet of a public road or cemetery or 300 feet of an occupied dwelling?
- Yes  No 9. Is the application submitted as a result of a Violation? NOV # \_\_\_\_\_
- Yes  No 10. Is the application submitted as a result of other laws or regulations or policies?

*Explain:* \_\_\_\_\_

- Yes  No 11. Does the application affect the surface landowner or change the post mining land use?
- Yes  No 12. Does the application require or include underground design or mine sequence and timing? (Modification of R2P2)
- Yes  No 13. Does the application require or include collection and reporting of any baseline information?
- Yes  No 14. Could the application have any effect on wildlife or vegetation outside the current disturbed area?
- Yes  No 15. Does the application require or include soil removal, storage or placement?
- Yes  No 16. Does the application require or include vegetation monitoring, removal or revegetation activities?
- Yes  No 17. Does the application require or include construction, modification, or removal of surface facilities?
- Yes  No 18. Does the application require or include water monitoring, sediment or drainage control measures?
- Yes  No 19. Does the application require or include certified designs, maps or calculation?
- Yes  No 20. Does the application require or include subsidence control or monitoring?
- Yes  No 21. Have reclamation costs for bonding been provided?
- Yes  No 22. Does the application involve a perennial stream, a stream buffer zone or discharges to a stream?
- Yes  No 23. Does the application affect permits issued by other agencies or permits issued to other entities?
- Yes  No 24. Does the application include confidential information and is it clearly marked and separated in the plan?

Please attach three (3) review copies of the application. If the mine is on or adjacent to Forest Service land please submit four (4) copies, thank you. (These numbers include a copy for the Price Field Office)

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.

R. Dan Eldredge GM 9/20/2016  
 Print Name Position Date Signature (Right-click above choose certify then have notary sign below)

Subscribed and sworn to before me this 20<sup>th</sup> day of September 2016

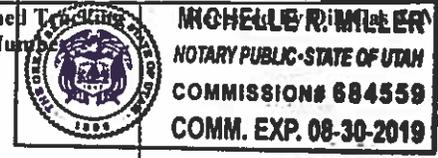
Notary Public: Michelle R. Miller state of Utah.

My commission Expires: 8/30/2019  
 Commission Number: 684559  
 Address: 101053 So River Front Parkway, Suite 120  
 City: 80 - 105 down State: UT Zip: 84095



For Office Use Only:

Assigned To: \_\_\_\_\_ Mining Number: \_\_\_\_\_





The segment of road to be graveled is shown on Plate 1A. Once the graveled road is in operation, it will be watered as needed in the future to control fugitive dust emissions.

**7) Conduct future monitoring of wind-blown fines:** After the cleanup is completed and the construction is finished, the company will continue with an operational monitoring plan for the area. This will consist ~~of anef annual~~quarterly inspection of the area to assess the amounts of future coal-fines accumulation, augmented by digital photography. Following two consecutive months of no coal transloading, the inspections shall be annual. Following two consecutive months of transloading at least 10,000 tons of coal, inspections shall be quarterly. Monitoring results are included in the annual report. The general approach of monitoring (depth assessment and location on a map) will be stated in the annual report. Refer to Document "Wildcat Coal Fines Issue - Division Order-04 Wind Blown Fines) Annual Monitoring", dated November 29, 2012. This detailed study will be performed ~~one~~ in the 2nd Quarter of each year.

**8) Bonding:** At present (July, 2010) the Wildcat reclamation bond is posted in the amount of \$1,144,000. This bond was re-adjusted in December 2007. Under the DO-04 cleanup plan there will be no additional demolition cost during final reclamation. The earthwork regrading costs will cancel out because Pond B is being replaced by Pond G. There will be slightly higher topsoiling costs and re-vegetation costs due to the additional disturbed acreage associated the cleanup plan. The existing disturbed area is 66.91 acres; the estimated disturbed area after implementation of the plan will be 73.26 acres, or an increase of 6.35 acres. Using the presently approved reclamation costs, the additional costs are computed as follows:

1) Topsoil:  $\$15,013/66.91 \text{ ac} = \$224/\text{acre}$

$\$224/\text{acre} \times 6.35 \text{ acres} = \$1422$

2) Reveg:  $\$359,746/66.91 \text{ ac} = \$5377/\text{acre}$

$\$5377/\text{acre} \times 6.35 \text{ acres} = \$34,141$

Total reclamation cost increase =  $\$1422 + \$34,141 = \$35,563$

Percent increase  $(\$1,144,000 + \$34,141)/\$1,144,000 = 1.028$