



Coastal
The Energy People

March 29, 1995

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

Re: Response to Review of Newly Formatted Plan, Soldier Creek Coal Company, Banning Siding Loadout, ACT/007/034, Folder #3, Carbon County, Utah

Dear Mr. Haddock:

Your letter to Rick Olsen dated December 13, 1994, contained deficiencies found during the Division's review of the above referenced permit. The following are responses to those deficiencies. Some of these responses consist of revised pages of the permit. In order to facilitate your review of the revised pages proposed deletions are marked by "strikeouts" and additions are shaded. Once approval is received for the revisions the strikeout marked text will be deleted and the shading of added text will be removed resulting in "clean" revisions which will be resubmitted for actual insertion into the permit.

R645-301-330 Operation Plan

Deficiency 1) The permittee must supply a plan for interim vegetation.

Response Page 3-6 of the permit has been revised to include a description of interim vegetation practices. Also minor changes have been made to Table 3-3 on Page 3-11 in this regard.

R645-301-341 Revegetation

Deficiency 1) The permittee must correct references to Appendix 3-4 as the test plot design and provide correct dates for test plot implementation.

Response Page 3-15 has been revised to show the correct date of test plot implementation. Also references in Appendix 3-4 to Appendix 7 have been corrected.

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

Deficiency 2) The permittee must revise the plan to contain standards for success for diversity, seasonality, and effectiveness in controlling erosion.

Response Page 3-17 have been revised to include a commitment to meet performance standards.

Deficiency 3) The permittee must revise the plan to include provisions to sample revegetated areas for woody species density in the fourth and eighth years of the bond liability period.

Response Page 3-17 has been revised to include a commitment to sample for woody species density in the fourth and eighth years of the bond liability period.

Deficiency 4) The plan to retain the sediment pond is not approvable in its current form. Soldier Creek would need to adequately address the requirements of R645-301-733.220. The permittee must provide adequate plans for the retention or the removal of the sediment pond.

Response Page 3-15 has been revised to state that the sediment pond will be reclaimed. Additional response to the sediment pond issue is presented below.

R645-301-730, 740, 750 Operational Hydrologic Information

Deficiency 1) The permittee must submit designs for the three haul road culverts.

Response Designs for the haul road and culverts were submitted to the Division in January 28, 1993, and were subsequently approved. However, it is hereby proposed that the culvert designs be inserted into the permit as Appendix 5-3. To facilitate this page 5-58 has been revised to refer to Appendix 5-3, the table of contents for Chapter 5 Exhibits and Appendices has been revised to include Appendix 5-3, and a copy of the culvert design calculations are attached hereto.

Deficiency 2) The permittee must submit information showing that the 25-year, 24-hour storm peak is as large or larger than the required 2-year, 6-hour storm.

Response An example using the SCS TR-55 method has been attached to show that the 25-year, 24-hour storm will produce a greater peak flow at the Banning site than a 2-year, 6-hour storm. Actual rainfall values for 25-year, 24-hour and 2-year, 6-hour storms and soil curve number for the Banning area were used. In this example peak flow produced by a 25-year, 24-hour storm would be 8.33 cfs. The peak flow produced by a 2-year, 6-hour storm would be 1.04 cfs. The diversions at the Banning site are adequate to convey the runoff generated by a 2-year, 6-hour storm. Since this conclusion is obvious from the attached example it is proposed that the example not be included in the permit document.

Deficiency 3) SCCC must submit amended text and/or maps that clearly show the location, size and measures used on alternate sediment control areas.

Response Exhibit 7-1 has been revised to clearly show the locations and sizes of the alternate sediment control areas and the measures to treat runoff from these areas. Also pages 7-39 and 7-39a have been revised to include discussions of the alternate sediment control areas. Exhibit 7-1 and page 7-45 have been revised to show and discuss a small area exemption (SAE). Field examination has shown that the previously approved SAE area No. 1 is actually tributary to the sedimentation pond. The calculations for the prior SAE should be removed from the M&RP. We have established a new SAE area No. 1 which is adjacent to the original SAE. We have included a text revision and calculations for the new area. The calculations indicate that the hydraulic length for this area is so short that no runoff is generated, therefore, it is demonstrated that no alternate sediment controls are needed.

Deficiency 4) SCCC must clarify whether the pond in existence now is the "new" pond or "old" pond as they are identified in Section R645-301-732.200 of the MRP. If the new pond has been constructed, all information about the old pond should be removed from the plan. If the new pond is in the planning stages, more information about the pond design is necessary before construction.

Response The current pond at the Banning site has been in existence for several years and the designs in the permit are for this pond. References to the "old" and "new" ponds are from an outdated version of the permit and were inadvertently included in the current submission. Pages 5-44, 7-26, 7-28, 7-29, 7-30, and 7-31 have been revised to eliminate references to "old", "new", or "proposed" ponds.

Deficiency 5) SCCC must submit information to the Division which would bring the inner-truck loop basin in compliance with all impoundment regulations and showing the regrading of the retention basin.

Response In the past SCCC has used the truck loop for coal storage and it is intended to continue to use this area for storage. To implement this, fill material has been placed in the truck loop. During early March the truck loop was surveyed and Exhibit 7-1 has been revised to show the results of that survey and to correctly identify the truck loop as a coal storage area rather than an impoundment. At this time coal is being stored in this area. The addition of fill material, coal base, and coal in this area effectively eliminates it as an impoundment. Pages 5-7, 5-23, 5-53, 5-54, 5-56, 7-33, and 7-41 have been revised to eliminate references to the truck loop as an impoundment.

R645-301-760 Reclamation Hydrologic Information

Deficiency 1) SCCC must submit information that clarifies the reclamation fate of the sediment pond in Sections R645-301-342.100 and R645-301-763. If there is no intention of reclaiming the pond, SCCC must submit information that shows that the pond is suitable as a permanent pond.

Response Rather than submit additional information to show that the pond is suitable as a permanent pond, SCCC will reclaim the pond. Pages 3-15, 5-54, 5-71, 7-30, 7-35, 7-36, and 7-37 have been revised to eliminate references to the sediment pond as a permanent feature and to indicate that the pond will be reclaimed.

R645-301-800 Bond

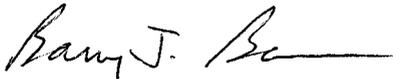
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Deficiency 1) The permittee must supply to the Division, additional bonding cost estimate information which will include but not be limited to the following: all structural dimensions and material types, and productivity calculations for all earthwork calculations.

Response Reclamation cost estimates have been recalculated based on current (1995) costs using the OSM format. The new estimated cost of reclamation is \$279,304 compared to a current bonding amount of \$211,000. Table 5-3, pages 5-75 through 5-82 should be replaced with revised Table 5-3, pages 5-75 through 5-82a attached hereto. After the Division reviews these cost estimates and determines a revised bond amount, an appropriate bond will be installed.

Daron, we appreciate the time extension granted to us to prepare this response. If there are any questions please contact us.

Very truly yours,



Barry J. Barnum

APPLICATION FOR PERMIT CHANGE

Title of Change: Response to review of newly formatted plan, Soldier Creek Coal Company, Banning Siding Loadout, Carbon County, Utah.

Permit Number: Act/ 007 /034

Mine: Banning Loadout
Permittee: Soldier Creek Coal Co.

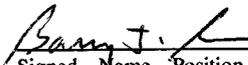
Description, include reason for change and timing required to implement:

Revision of permit documents in response to Division requirements.

- | | | |
|---|--|--|
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 1. Change in the size of the Permit Area? acres <input 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 checked="" type="checkbox"/> Yes | <input 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 checked="" type="checkbox"/> Yes | <input 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 type="checkbox"/> Yes | <input checked="" 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? |

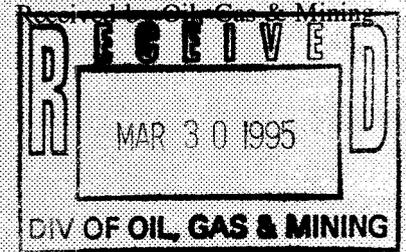
X Attach 3 complete copies of proposed permit change as it would be incorporated into the Mining and Reclamation Plan.

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.

 - BARRY - J. BARNUM
 Signed - Name - Position - Date ENVIRONMENTAL ENGINEER
 MARCH 29, 1995

Subscribed and sworn to before me this 29 day of March, 19 95.
Lorraine B. Larsen
 Notary Public

My Commission Expires: 12/1, 19 98
 Attest: STATE OF Utah
 COUNTY OF Carbon



ASSIGNED PERMIT CHANGE NUMBER

