

0006



# State of Utah

DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF OIL, GAS AND MINING

Norman H. Bangarter  
Governor

Dee C. Hansen  
Executive Director

Dianne R. Nielson, Ph.D.  
Division Director

355 West North Temple  
3 Triad Center, Suite 350  
Salt Lake City, Utah 84180-1203  
801-538-5340

8 December 1992

**TO:** Pamela Grubaugh-Littig, Permit Supervisor

**FROM:** Hugh Klein, Geologist *HK*

**RE:** Technical Deficiency For Sunnyside Cogeneration Associates' Permit Application Package, PRO/007/035, Folder #~~8~~, Carbon County, Utah

*#2*

## SYNOPSIS

The following Technical Deficiency (TD) memorandum covers the Geology Section of Sunnyside Cogeneration Associates' (SCA) PAP received by the Division on 3 December 1992. For purposes of easy reference, this analysis follows the format used in the Geology Section of the PAP.

## ANALYSIS

**622.100:** Plate 6-1 is inadequate: it is not certified and has no North arrow.

**624.100**

page 600-6

The last sentence in the paragraph discussing the Price River Formation states, "The Price River does not occur within the SCA Permit Area." Although it is a minor change, the sentence should read, "The Price River Formation does not occur within the SCA Permit Area."

**624.200:** The statement under this section that no surface coal mining will take place within the SCA Permit Area is erroneous. Recovery of the coal mine waste for the cogeneration plant is considered surface coal mining by the Division.

**624.220 through 624.230:** The results presented do not adequately address the issue of acid-toxic, acid-forming and/or alkalinity-producing material. Detailed technical deficiencies are being outlined in the TD memorandum for the Soils section.

**626:** The statement that SCA is reclaiming coal mine waste is erroneous. Recovery of the coal mine waste for the cogeneration plant is considered surface coal mining by the Division. R645-301-624.300 is not applicable to a surface mine, and as such, no waiver is necessary. The adequacy of R645-301-624.200 is still being addressed as discussed above under 624.220 through 624.230.

PGL Memo  
SCA TD  
Page 2  
8 December 1992

**631.100:** The applicant has failed to commit to protection of temporary casing or sealed drill holes. In addition, for permanently cased or sealed holes, the applicant has not specifically committed to manage these holes in accordance with R645-301-631 and 30 CFR 75.1711. In order to ensure proper management of drill holes, the applicant must commit to notifying and receiving approval from the Division prior to any drilling activities.

### RECOMMENDATIONS

In order for the Geology Section of the SCA PAP to be adequate, in terms of complying with the Utah R645 Coal Mining Rules, the deficiencies outlined above must be addressed. Compliance will be achieved by addressing the individual comments.

c: Henry Sauer  
hk