

0006

ACT/007/035
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SUNNYSIDE COGENERATION ASSOCIATES

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SALT LAKE CITY, UTAH 84158-0087

December 13, 1993

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DEC 13 1993

DIVISION OF
OIL, GAS & MINING

Mr. Randy Harden
Senior Reclamation Engineer
Division of Oil, Gas and Mining
3 Triad Center, Suite 350
Salt lake City, Utah 84180-1203

RE: Sunnyside Cogeneration Associates (SCA) Permit No. ACT/007/035
Project Number EC450593
Violation N93-13-2-1

Dear Randy,

This letter is written in regards to Violation N9-13-2-1, for

"Failure to comply with the terms and conditions of the permit issued. Failure to provide a complete and concise plan of facilities and structures used in common. Failure to provide complete and adequately detailed information to be included in the plan at a minimum under R645-301 and R645-302."

Attached with this letter for your review is a proposed schedule to address the Findings dated November 15, 1993. The first two pages of the Schedule are a summary outline of the whole project. Details for the summary information can be found on the remaining seven pages of the Schedule. Also included in the detailed information are the critical versus the noncritical tasks. We will easily be able to identify any changes to the proposed schedule and their effect during the coarse of the project.

In the schedule I have identified three separate time periods for major submittals to DOGM. These time periods all include meetings with DOGM, preparation of the submittal to DOGM, a DOGM review period, and a final submittal which incorporates the information into the PAP. The three time periods are outlined below.

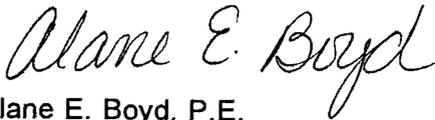
<u>Dates</u>	<u>Submittal Description</u>
February 1, 1994 to April 15, 1994	Resource Information Draft Bond
August 1, 1994 to October 15, 1994	Final Resource Information Operation Plan Worst Case Scenario Reclamation Plan Final Bond
February 1, 1995 to April 15, 1995	Final Reclamation Plan

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Between the submittal periods SCA will be gathering data, preparing designs and meeting with DOGM to discuss preliminary information.

SCA is committed to meeting every six weeks with DOGM to review the schedule and provide a report of progress during the completion of the work. If you have any questions, please feel free to give me a call.

Sincerely,



Alane E. Boyd, P.E.
Senior Engineer

cc: Brian Burnett, CDN
Jim Carter, DOGM
David Pearce, SCA
Joe Helfrich, DOGM

**SUNNYSIDE COGENERATION ASSOCIATES PAP COMPLETION
SCHEDULE/PROGRESS CONTROL
RESPONSE TO VIOLATION 93-13-2-1**

ID	Name	Duration	1st Quarter				2nd Quarter			3rd Quarter			4th Quarter			1st Quarter			2n
			er	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar
1	SCHEDULING OF PAP INFORMATION	4w	er	Dec															
5	RESOURCE INFORMATION	44.8w	er	Dec															
6	300 - BIOLOGY	25w	er	Dec															
12	400 - LAND USE & AIR QUALITY	6w	er	Dec															
13	DISTURBED AREA MAPS	6w	er	Dec															
17	500 - ENGINEERING	1w		Dec															
18	INSPECTION SCHEDULE 514	1w		Dec															
21	600 - GEOLOGY	26.8w		Dec															
22	TOXIC & ACID FORMING DATA	26.8w		Dec															
30	700 - HYDROLOGY	32.8w	er	Dec															
32	PEIZOMETERS	11.8w		Dec															
40	RESOUC E INFORMATION SUBMITTALS	35.8w		Dec															
41	SUBMITTAL R.I. #1	10w		Dec															
48	SUBMITTAL R.I.#2	10w		Dec															
55	OPERATION PLAN	31.8w		Dec															
56	200 -SOILS	2w		Dec															
59	500 - ENGINEERING	21.8w		Dec															
66	HANDLING & DISPOSAL OF COAL MINE WASTE 528	21.8w		Dec															
68	SPOIL PLACEMENT PLAN 528.300	21.8w		Dec															
76	OPERATION PLAN SUBMITTALS	10w		Dec															
77	SUBMITTAL O.P.#1	10w		Dec															
84	RECLAMATION PLAN	66.8w		Dec															
85	WORST CASE SCENARIO RECLAMATION PLAN	30.5w		Dec															
88	FINAL WORST CASE SCENARIO RECLAMATION PLAN	22w		Dec															
98	FINAL RECLAMATION PLAN	22w		Dec															

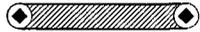
Project Manager: Alane E. Boyd
Date: 12/13/93
File: SUNNYII.MPP

Critical  Progress  Summary 
 Noncritical  Milestone  Rolled Up 

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SCHEDULE/PROGRESS CONTROL
RESPONSE TO VIOLATION 93-13-2-1**

ID	Name	Duration	er	1st Quarter			2nd Quarter			3rd Quarter			4th Quarter			1st Quarter			2n	
			Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	
107	RECLAMATION PLAN SUBMITTALS	62.3w		▶																
108	SUBMITTAL OF DRAFT BOND	10w		▶																
115	SUBMITTAL WORST CASE SCENARIO	10w									▶									
122	SUBMITTAL FINAL RECLAMATION PLAN	10w																▶		

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Critical 
Noncritical 

Progress 
Milestone 

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ID	Name	Duration	1st Quarter				2nd Quarter			3rd Quarter			4th Quarter			1st Quarter			2n
			Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr
1	SCHEDULING OF PAP INFORMATION	4w	Progress																
2	PRILIMINARY SCHEDULE	2w	Milestone																
3	REVIEW WITH DOGM	1w	Milestone																
4	FINAL SCHEDULE - ABATEMENT OF VIOLATION 93-13-2-1	1w	Milestone																
5	RESOURCE INFORMATION	44.8w	Progress																
6	300 - BIOLOGY	25w	Progress																
7	DESCRIPTION OF RIPARIAN AREA 321.100	2w	Progress																
8	SPRING FISH INVENTORY & REPORTING 322.200	4w						Milestone	Milestone										
9	ENGINEERING SURVEY OF REFERENCE AREAS 323.100	4w	Progress																
10	FINAL VEGETATION RESOURCE MAP	2w		Progress															
11	MAP DELINEATING FISH INVENTORY LOCATIONS	2w	Progress																
12	400 - LAND USE & AIR QUALITY	6w	Progress																
13	DISTURBED AREA MAPS	6w	Progress																
14	PRELIMINARY DISTURBED AREA MAPS	2w	Progress																
15	FIELD VERIFY DISTURBED AREA	2w		Progress															
16	FINAL DISTURBED AREA MAPS	2w		Progress															
17	500 - ENGINEERING	1w	Progress																
18	INSPECTION SCHEDULE 514	1w	Progress																
19	REFUSE PILE 514.200	1w	Milestone																
20	IMPOUNDMENTS 514.300	1w	Progress																
21	600 - GEOLOGY	26.8w	Progress																
22	TOXIC & ACID FORMING DATA	26.8w	Progress																
23	DRILLING PLAN	2w		Progress															
24	REVIEW WITH DOGM	1w		Progress															
25	FINAL DRILLING PLAN	2w		Progress															

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			Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr
26	DRILLING (WEATHER DEPENDENT)	2w					◆◆												
27	SAMPLING	8w						▨	▨	▨									
28	ANALYSIS	2w									▨								
29	REPORTING	2w										▨							
30	700 - HYDROLOGY	32.8w	▬																
31	FINAL SED POND & DIVERSION DRAWINGS	2w	▨																
32	PEIZOMETERS	11.8w	▬																
33	LOCATION PLAN	2w		▨															
34	DRILLING (WEATHER DEPENDENT)	2w						◆◆											
35	SAMPLING PLAN	2w		▨															
36	GATHER FLOW DATA	16w		◆	▨	▨	▨	▨	▨	▨	◆								
37	DETERMINE GROUNDWATER MOVEMENT	4w							▨	▨									
38	MASS BALANCE CALCULATIONS	4w									▨	▨							
39	PROBABLE HYDROLOGIC CONSEQUENCES	4w										▨	▨						
40	RESOUCE INFORMATION SUBMITTALS	35.8w	▬																
41	SUBMITTAL R.I. #1	10w	▬																
42	MEET WITH DOGM	0h		◆															
43	PREPARE DRAFT SUBMITTAL	4w			▨														
44	SUBMIT TO DOGM	0h				◆													
45	REVIEW BY DOGM	4w				▨													
46	INCORPORATE INTO PAP	2w						▨											
47	FINAL SUBMITTAL R.I.#1	0h							◆										
48	SUBMITTAL R.I.#2	10w	▬																
49	MEET WITH DOGM	0h											◆						
50	PREPARE DRAFT SUBMITTAL	4w											▨						

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			Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	
51	SUBMIT TO DOGM	0h											◆							
52	REVIEW BY DOGM	4w											▨							
53	INCORPORATE INTO PAP	2w												▨						
54	FINAL SUBMITTAL R.I.#2	0h												◆						

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RESPONSE TO VIOLATION 93-13-2-1**

ID	Name	Duration	er	1st Quarter				2nd Quarter			3rd Quarter			4th Quarter			1st Quarter			2n
			Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	
80	SUBMIT TO DOGM	0h											◆							
81	REVIEW BY DOGM	4w											▨							
82	INCORPORATE INTO PAP	2w												▨						
83	FINAL SUBMITTAL O.P.#1	0h												◆						

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				Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr		
84	RECLAMATION PLAN	66.8w																				
85	WORST CASE SCENARIO RECLAMATION PLAN	30.5w																				
86	CONCEPTUAL PLAN	1.5w																				
87	CALCULATE DRAFT BOND QUANTITY	3w																				
88	FINAL WORST CASE SCENARIO RECLAMATION PLAN	22w																				
89	AREAS FOR BOND QUANTITIES	2w																				
90	PHASING PLAN	2w																				
91	DRAINAGE PLANS	8w																				
92	GRADING PLANS	8w																				
93	TOPSOIL PLAN	2w																				
94	SEEDING PLAN	2w																				
95	DETAIL SHEETS	1w																				
96	WORST CASE SCENARIO RECLAMATION TEXT	6w																				
97	FINAL BOND QUANTITIES	4w																				
98	FINAL RECLAMATION PLAN	22w																				
99	AREAS FOR CONTEMPORANEOUS RECLAMATION	2w																				
100	PHASING PLAN	2w																				
101	DRAINAGE PLANS	8w																				
102	GRADING PLANS	8w																				
103	TOPSOIL PLAN	2w																				
104	SEEDING PLAN	2w																				
105	DETAIL SHEETS	1w																				
106	FINAL RECLAMATION PLAN TEXT	6w																				
107	RECLAMATION PLAN SUBMITTALS	62.3w																				
108	SUBMITTAL OF DRAFT BOND	10w																				

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				Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar
109	MEET WITH DOGM	0h			◆														
110	PREPARE DRAFT SUBMITTAL	4w			▨														
111	SUBMIT TO DOGM	0h				◆													
112	REVIEW BY DOGM	4w				▨													
113	INCORPORATE INTO PAP	2w					▨												
	FINAL SUBMITTAL OF DRAFT BOND	0h						◆											
115	SUBMITTAL WORST CASE SCENARIO	10w										▬	▬	▬					
116	MEET WITH DOGM	0h										◆							
117	PREPARE DRAFT SUBMITTAL	4w										◊	◊						
118	SUBMIT TO DOGM	0h											◆						
119	REVIEW BY DOGM	4w											▨						
120	INCORPORATE INTO PAP	2w												▨					
121	FINAL SUBMITTAL FOR WORST CASE	0h													◆				
122	SUBMITTAL FINAL RECLAMATION PLAN	10w																▬	▬
123	MEET WITH DOGM	0h																◆	
124	PREPARE DRAFT SUBMITTAL	4w																◊	◊
125	SUBMIT TO DOGM	0h																	◆
126	REVIEW BY DOGM	4w																◊	◊
127	INCORPORATE INTO PAP	2w																	◊
128	FINAL SUBMITTAL FOR FINAL RECLAMATION	0h																	◆

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 Noncritical  Milestone  Rolled Up 