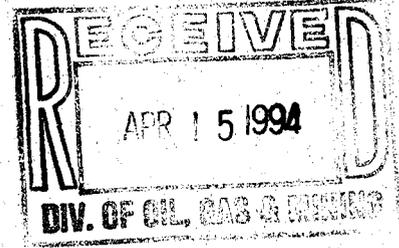


**ECKHOFF, WATSON AND PREATOR ENGINEERING**

1121 East 3900 South, Suite C 100 • Salt Lake City, UT 84124 • (801) 261-0090, FAX(801) 266-1671



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
PAP COMPLETION - Violation N93-13-2-1
Progress Report #3
For the Period Ending March 31, 1994**

Dear Randy,

All conditions included in original permit document have been incorporated into Violation N93-13-2-1. An updated schedule for completion of the various aspects of the PAP is attached with this Status Report. The schedule details critical and noncritical tasks, as well as the progress made towards each task.

At this time SCA requests and extension be granted to July 15, 1994 for Violation N93-13-2-1. At that time SCA will submit for DOGM approval the Worst Case Scenario Reclamation Plan. This will be ahead of the schedule that has previously been submitted.

Work Completed This Period:

1. Completed Phasing Plans at 1" = 100' for the Worst Case Scenario Reclamation Plan. Completed a Technical Review of these drawings. These will be submitted to DOGM in July with other information
2. Prepared draft grading plans (1"=100') for Worst Case Reclamation. Completed a Technical Review of these drawings. Currently preparing final drawings based on review.
3. Currently revising final plans (1"=100'), designs and calculations for the drainage areas for Worst Case Reclamation. These changes are based on final grading for Worst Case Reclamation
4. Revised design of weirs based on DOGM comments. Weirs were approved by DOGM. Fabrication was completed on the weirs.
5. Contacted Pioneer Environmental regarding the Spring Fish Inventory. Pioneer contacted Division of Wildlife Resources. The field inventory will be conducted during the last week of April.

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Progress Report #3
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6. Continued to negotiate contract for drilling services to drill the west cell and lifts. So far we have been unsuccessful in acquiring a signed contract. We will analyze other bids and may begin negotiations with another company. Drilling will not begin in April. We anticipate that drilling will begin in May.
7. Updated Chapter Two of the PAP regarding soils handling & storage. Updated drawings to include Storage Area One Topsoil Pile.
8. Began a previously mined area map.
9. Completed Existing Surface Features Map.
10. Updated sections of PAP regarding burned waste.
11. Coordinated and contracted with geotechnical company to drill, sample and analyze the excess spoil site. Drilling should begin the first week in May.
12. Prepared various response letters to clarify questions from Bill Malencik regarding details in the PAP.

Work Anticipated Next Period:

1. Finalize grading and drainage plans for Worst Case Reclamation
2. Begin topsoil and seeding plan for Worst Case Reclamation
3. Revise PAP text to incorporate Worst Case Reclamation Plan. Prepare Final Bond Quantities.
4. Complete field work for Spring Fish Inventory
5. Begin sampling Seep as required by DEQ.
6. Finalize Previously Mined Areas Map, Existing Surface Features Map, and Mine Sequencing Map.

Technical or Scheduling Issues:

1. A detailed schedule of all tasks is attached with this progress report. The date for completion of the PAP items has moved from April 1995 to February 1995.

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2. **Schedule has changed due to drilling contractual problems.** SCA proposes to change the timing of submittals as follows:

- | | | |
|----|---|------------------|
| a. | Worst Case Reclamation Plan and Final Bond Quantities | July 15, 1994 |
| b. | Operations Plan | October 1, 1994 |
| c. | Final Resource Information and Final Reclamation Plan | January 15, 1995 |

If you have any questions, please feel free to give me a call.

Sincerely,



Alane E. Boyd, P.E.
Senior Engineer

Attachments

cc: David Pearce
Brian Burnett
Joe Helfridge

SUNNYSIDE COGENERATION ASSOCIATES PAP COMPLETION SCHEDULE/PROGRESS CONTROL

ID	Name	1994													
		Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr
4	RESOURCE INFORMATION	[Solid black bar from Mar to Feb]													
5	300 - BIOLOGY	[Solid black bar from Mar to May]													
7	SPRING FISH INVENTORY & REPORTING 322.200	[Hatched bar from Apr to May with diamond milestones at start and end]													
21	600 - GEOLOGY	[Solid black bar from Mar to Sep]													
22	TOXIC & ACID FORMING DATA	[Solid black bar from Mar to Sep]													
27	DRILLING (WEATHER DEPENDENT)	[Hatched bar in May]													
28	TESTING	[Hatched bar from Jun to Jul]													
29	ANALYSIS	[Hatched bar in Aug]													
30	REPORTING	[Hatched bar in Sep]													
31	700 - HYDROLOGY	[Solid black bar from Mar to Dec]													
33	MONITORING WELLS	[Solid black bar from Mar to May]													
35	DRILLING (WEATHER DEPENDENT)	[Hatched bar in May]													
43	GATHER FLOW DATA	[Hatched bar from Apr to Oct with diamond milestones at start and end]													
44	DETERMINE GROUNDWATER MOVEMENT	[Hatched bar from Jul to Aug]													
45	MASS BALANCE CALCULATIONS	[Hatched bar in Oct]													
46	PROBABLE HYDROLOGIC CONSEQUENCES	[Hatched bar in Nov]													
47	RESOURCE INFORMATION SUBMITTALS	[Solid black bar from Mar to Feb]													
48	SUBMITTAL R.I. #1	[Solid black bar from Mar to Apr]													
52	REVIEW BY DOGM	[Hatched bar in Mar]													
53	INCORPORATE INTO PAP	[Hatched bar in Apr]													
54	FINAL SUBMITTAL R.I.#1	[Diamond milestone in Apr]													
55	SUBMITTAL R.I.#2	[Solid black bar from Nov to Jan]													
56	MEET WITH DOGM	[Diamond milestone in Nov]													
57	PREPARE DRAFT SUBMITTAL	[Hatched bar in Dec]													
58	SUBMIT TO DOGM	[Diamond milestone in Dec]													
59	REVIEW BY DOGM	[Hatched bar in Jan]													
60	INCORPORATE INTO PAP	[Hatched bar in Feb]													
61	FINAL SUBMITTAL R.I.#2	[Diamond milestone in Feb]													

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Critical 
Noncritical 

Progress 
Milestone 

Summary 
Rolled Up 

SUNNYSIDE COGENERATION ASSOCIATES PAP COMPLETION SCHEDULE/PROGRESS CONTROL

ID	Name	1994													
		Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr
62	OPERATION PLAN	[Critical Summary Bar]													
63	200 -SOILS	[Critical Summary Bar]													
64	TOPSOIL HANDLING TESTING PLAN	[Critical Milestone]													
65	NARRATIVE DESCRIBING TOPSOIL HANDLING & STORA	[Critical Milestone]													
66	500 - ENGINEERING	[Critical Summary Bar]													
67	PREVIOUSLY MINED AREAS MAP 521.112	[Critical Milestone]													
68	EXISTING SURFACE FEATURES MAP 521.120	[Critical Milestone]													
69	MINE SEQUENCING MAPS 521.141		[Noncritical Progress]												
70	MINING METHODS DESCRIPTION 523			[Noncritical Progress]											
71	MINE STRUCTURES & FACILITIES DESCRIPTION 526.110				[Noncritical Progress]										
72	MINING QUANTITIES CALCULATIONS				[Noncritical Progress]										
73	HANDLING & DISPOSAL OF COAL MINE WASTE 528	[Critical Summary Bar]													
75	SPOIL PLACEMENT PLAN 528.300	[Critical Summary Bar]													
78	DRILLING (WEATHER DEPENDENT)			[Noncritical Progress]											
79	TESTING			[Noncritical Progress]											
80	ANALYSIS					[Noncritical Progress]									
81	REPORTING						[Noncritical Progress]								
82	WASTE SITE DESIGN DRAWINGS					[Noncritical Progress]									
83	OPERATION PLAN SUBMITTALS							[Critical Summary Bar]							
84	SUBMITTAL O.P.#1							[Critical Summary Bar]							
85	MEET WITH DOGM							[Critical Milestone]							
86	PREPARE DRAFT SUBMITTAL							[Noncritical Progress]							
87	SUBMIT TO DOGM								[Critical Milestone]						
88	REVIEW BY DOGM								[Noncritical Progress]						
89	INCORPORATE INTO PAP									[Noncritical Progress]					
90	FINAL SUBMITTAL O.P.#1										[Critical Milestone]				

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Critical 
Noncritical 

Progress 
Milestone 

Summary 
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SUNNYSIDE COGENERATION ASSOCIATES PAP COMPLETION SCHEDULE/PROGRESS CONTROL

ID	Name	1994												Jan	Feb	Mar	Apr
		Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec						
91	RECLAMATION PLAN	[Solid bar from Mar to Mar]															
92	WORST CASE SCENARIO RECLAMATION PLAN	[Solid bar from Mar to Jun]															
95	FINAL WORST CASE SCENARIO RECLAMATION PLAN	[Solid bar from Mar to May]															
96	AREAS FOR BOND QUANTITIES			[Hatched]													
98	DRAINAGE PLANS	[Hatched]	[Hatched]	[Hatched]													
99	GRADING PLANS	[Hatched]	[Hatched]	[Hatched]	[Hatched]												
100	TOPSOIL PLAN		[Milestone]	[Milestone]													
101	SEEDING PLAN		[Milestone]	[Milestone]													
102	DETAIL SHEETS			[Hatched]													
103	WORST CASE SCENARIO RECLAMATION TEXT		[Hatched]	[Hatched]	[Hatched]												
104	FINAL BOND QUANTITIES			[Hatched]	[Hatched]												
105	FINAL RECLAMATION PLAN																
106	AREAS FOR CONTEMPORANEOUS RECLAMATION																
107	PHASING PLAN																
108	DRAINAGE PLANS																
109	GRADING PLANS																
110	TOPSOIL PLAN																
111	SEEDING PLAN																
112	DETAIL SHEETS																
113	FINAL RECLAMATION PLAN TEXT																
114	RECLAMATION PLAN SUBMITTALS	[Solid bar from Mar to Mar]															
115	SUBMITTAL OF DRAFT BOND	[Solid bar from Mar to Apr]															
119	REVIEW BY DOGM	[Hatched]															
120	INCORPORATE INTO PAP		[Hatched]														
121	FINAL SUBMITTAL OF DRAFT BOND		[Milestone]														
122	SUBMITTAL WORST CASE SCENARIO																
123	MEET WITH DOGM																
124	PREPARE DRAFT SUBMITTAL																
125	SUBMIT TO DOGM																
126	REVIEW BY DOGM																
127	INCORPORATE INTO PAP																
128	FINAL SUBMITTAL FOR WORST CASE																
129	SUBMITTAL FINAL RECLAMATION PLAN																
130	MEET WITH DOGM																
131	PREPARE DRAFT SUBMITTAL																

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Critical 
Noncritical 

Progress 
Milestone 

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SUNNYSIDE COGENERATION ASSOCIATES PAP COMPLETION SCHEDULE/PROGRESS CONTROL

ID	Name	1994												Jan	Feb	Mar	Apr
		Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec						
132	SUBMIT TO DOGM													◆			
133	REVIEW BY DOGM													◆	◆		
134	INCORPORATE INTO PAP														◆	◆	
135	FINAL SUBMITTAL FOR FINAL RECLAMATION															◆	

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Critical 
Noncritical 

Progress 
Milestone 

Summary 
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