

0050

SUNNYSIDE COGENERATION ASSOCIATES

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March 1, 1994

MAR 1 1994

Mr. Randy Harden
Division of Oil, Gas and Mining
3 Triad Center - Suite 350
Salt Lake City, UT 84180-1203

*ACT/002/035 #2
Copy Pam*

RE: Project No. EC450593: Sunnyside Cogeneration Associates - Permit Amendments;

Dear Randy,

Sunnyside Cogeneration Associates (SCA) is submitting the following ammended portions to the permit. The paragraphs below describe each of these submittals in further detail.

1. **New Access Road Drainage**
Plates 1-1, 5-3, and 7-1A, Appendix 7-3 Pasture Pond
2. **Revised Road Classifications**
Plates 5-2, 5-2A, 5-2B, 5-2C, 5-2D, 5-2E, 5-2F, 5-2G, 5-2H, and 5-2J
3. **Riparian Vegetation Description** - Appendix 3-1
4. **Vegetation Resource Map** - Plate 3-3
5. **Revised Drilling Plan** - Appendix 6-5
6. **Conceptual Plan for Worst Case Senario Reclamation**
Plates 8-2, 8-3, 8-4, 8-5, Revised Bond Calculations
7. **Hydrologic Calculations for the 36" culvert under the railroad tracks north of the Coarse Refuse Toe Pond** - Appendix 7-3

1. New Access Road Drainage

Plates 1-1, 5-3, and 7-1A, Index Map, New Access Road Record Drawing, and Pasture Pond Drainage, respectively, have been revised to show the revised permit boundary and drainage configuration that will be constructed to capture runoff from the New Access Road. Construction of these diversions is expected to begin as weather permits.

The plans that were submitted previously have been updated due to verification of current field conditions. The drainage from the New Access Road will now be diverted through the center of the New Access Road and then to the Pasture Pond. The SCA Permit Boundary has changed to reflect the recent revisions to the hydrologic regime of the area. New hydrologic calculations for the Pasture Sediment Pond are also included with this submittal.

2. Plate 5-2, Revised Road Classification Map

Due to further review of OSM's 1988 final rule on road classification regulations under 30 CFR 816.150 / 817.150(a), the roads within the SCA Permit Site have been reclassified. Plate 5-2, Road Classification Map, shows these new classifications. The previous road classifications submitted by SCA do not accurately depict the usage of the roads within the SCA Permit Site. The revised plate is a more accurate representation of the roads in regards to the frequency and purpose for which they are utilized.

The final rules state:

Each of the factors that distinguish primary roads from ancillary roads is related to an increased potential for environmental harm. Roads used for haulage of coal, overburden, spoil, etc. are classified as primary roads under the final rules. These roads are typically used by large, heavy vehicles. . . .

Ancillary roads are all roads not designated as primary. Ancillary roads are subject to relatively infrequent use by smaller, lighter weight vehicles. Consequently, the potential severity and risk of harm from use by such vehicles is smaller. . . . Examples of ancillary roads are those which provide access to air shafts, sediment ponds, and locations for hydrologic sampling, equipment maintenance, monitoring, or other similar uses.

Plates 5-2A, 5-2B, 5-2C, 5-2D, 5-2E, 5-2F, 5-2G, 5-2H, and 5-2J are also submitted. The cross sections have been renumbered to follow the numbering in Plate 5-2.

3. Riparian Vegetation Discription (Appendix 3-1)

SCA is resubmitting the Riparian Vegetation Discussion which was originally required under Permit Condition No. 3. According to DOGM, the original report did not include adequate information to satisfy the requirements of the permit condition. Therefore, SCA is resubmitting the report which now includes a discussion of the methodology used in determining species cover. In addition, the Division noted that a comprehensive plant species list was not provided. SCA does not agree with this determination due to the fact that the original permit condition specified a discussion of riparian vegetation only. The discussion below provides further explanation.

During a telephone conversation on November 8, 1993 with Ms. Susan White of DOGM, the findings of Permit Condition No. 3 were discussed. The conversation focused on the original requirements of the permit condition and what was subsequently submitted. The original permit condition specifically asked for a "...detailed discussion of the riparian vegetation type...". In response to this permit condition, SCA submitted a detailed discussion of the riparian vegetation type. Nonetheless, DOGM responded in the report of findings, that the requirements of the permit condition were not met. DOGM states that there were six additional species identified within the seep area that had not been discussed in the report.

In an attempt to resolve the situation, SCA conducted a site visit on January 19, 1994 to identify the six additional species located in the upland portion of the seep area. The species that were identified were upland species that exist in other areas of the SCA Permit Site. In addition, these species are already discussed in Chapter Three of the PAP. As a result, the Riparian Vegetation Discussion does not include duplicate discussions of these species, but rather refers the reader to Chapter Three of the PAP for additional information.

In regards to DOGM's request for additional information regarding methodology, enclosed are revised copies of the riparian vegetation discussion. The revised report includes a discussion of the methodology used for determining cover. It should be recognized that the methodology used was based on our interpretation of the permit condition requirements. As a result, methods outlined in the 1987 Corps of Engineers Wetlands Delineation Manual were utilized.

4. Vegetation Resource Map (Plate 3-3)

The Vegetation Resource Map is a new map to be included in Chapter Three of the SCA PAP. This map shows the boundaries between the various plant communities within the SCA Permit Area. The map includes the following information:

- a) Accurate (field surveyed) location of the vegetation reference areas;
- b) Location of the hydrophytic vegetation area; and
- c) Existing Atriplex Grass areas and Pinyon-Juniper/Sagebrush Grass areas.

5. Revised Drilling Plan for the Coarse Refuse Pile

During the February 2, 1994 meeting at DOGM, DOGM presented a response to the proposed drilling plan for the coarse refuse pile submitted in September 1993. Both sampling requirements and testing parameters were discussed. SCA incorporated the changes that were discussed into the proposed drilling plan and a copy of this plan is included with this submittal. This will replace the plan found in Appendix 6-5.

6. Conceptual Plan for Worst Case Scenario Reclamation

This submittal includes the proposal for bond amount based on the Conceptual Plan for Worst Case Scenario Reclamation. Also included are four summary tables which can be used to verify the proposed bond quantities. The conceptual reclamation plan set includes four sheets which are listed below:

- 1) Plate 8-2, Phasing Plan
- 2) Plate 8-3, Drainage Plan
- 3) Plate 8-4, Borrow Material Plan
- 4) Plate 8-5, Seeding Plan

7. Hydrologic Calculations for the 36" culvert under the railroad tracks north of the Coarse Refuse Toe Pond - Appendix 7-3

This existing culvert has a normal capacity that far exceeds the requirements of R645-301-742.333 to carry the peak flow from the 10 year 6 hour storm. To allow for vegetation and sediment accumulation at the outlet as well as for the proposed weir placed at the inlet, these revised calculations show that the culvert will safely carry the required design peak flow with a capacity reduced to that of a 12" cmp.

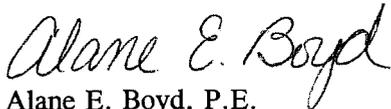
This culvert must therefore remain opened at least to the equivalent of a 12" diameter opening.

If you have any questions about items in this submittal, please feel free to call.

Sincerely,



David Pearce
Authorized Member, Management Committee



Alane E. Boyd, P.E.
Senior Engineer

Enclosure

cc: Brian Burnett, CDN
Bill Malencik, DOGM

APPLICATION FOR PERMIT CHANGE

Title of Change: **SUNNYSIDE COGENERATION ASSOCIATES
PERMIT AMENDMENTS**

New Access Road Drainage Revised Road Classifications
Riparian Vegetation Vegetation Resource Map
Revised Drilling Plan Conceptual Plan for the Worst Case Scenario
Hydrologic calcs for the 36" cmp north of the Coarse Refuse Toe Pond

Permit Number: **ACT/007/035**

Mine: **Sunnyside Cogen. Assoc.**

Permittee: **Sunnyside Cogen. Assoc.**

Description - include reason for change and timing required to implement: **New Access Road Drainage, Revised Road Classifications, Riparian Vegetation, Vegetation Resource Map, Revised Drilling Plan, Conceptual Plan for the Worst Case Scenario**

- | | | |
|---|--|---|
| <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | 1. Change in the size of the Permit Area? <u>0.4</u> acres <input type="checkbox"/> increase <input checked="" type="checkbox"/> decrease. |
| <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | 2. Change in the size of the Disturbed Area? <u>0.4</u> acres <input type="checkbox"/> increase <input checked="" 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 type="checkbox"/> Yes | <input checked="" 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? Violation # |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 8. Permit change as a result of a Division Order? D.O. # |
| <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | 9. Permit change as a result of other laws or regulations? Explain: 30 CFR 816.150 / 817.150 |
| <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? N/A |

Attached **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 aspects with the laws of Utah in reference to commitments, undertakings, and obligations, herein.

Alane E. Boyd, P.E. 3/1/94
Signed - Name - Position - Date

Subscribed and sworn to before me this 1st day of March, 1994
Marilyn Young
Notary Public

NOTARY PUBLIC
MARILYN YOUNG
1121 E. 3900 So. #C-100
Salt Lake City, Utah 84124
My Commission Expires
March 8, 1997
STATE OF UTAH

My Commission Expires:
Attest: STATE OF
COUNTY OF

Received by Oil, Gas & Mining

ASSIGNED PERMIT CHANGE NUMBER

Application for Permit Change Detailed Schedule of Changes to the Permit

Title of Change: SUNNYSIDE COGENERATION ASSOCIATES PERMIT AMENDMENTS New Access Road Drainage Revised Road Classifications Riparian Vegetation Vegetation Resource Map Revised Drilling Plan Conceptual Plan for the Worst Case Senario Hydrologic calcs for the 36" cmp north of the Coarse Refuse Toe Pond	Permit Number: ACT/007/035 Mine: Sunnyside Cogen. Assoc. Permittee: Sunnyside Cogen. Assoc.
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Provide a detailed listing of all changes to the mining and reclamation plan which will be required as a result of this proposed permit change. Individually list all maps and drawings which are to be added, replaced, or removed from the plan. Include changes of the table of contents, section of the plan, pages or other information as needed to specifically locate, identify and revise the exiting mining and reclamation plan. **Include page, section and drawing numbers as part of the description.**

		DESCRIPTION OF MAP, TEXT, OR MATERIALS TO BE CHANGED	
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Plate 1-1
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Plate 5-2
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Plate 5-2A
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Plate 5-2B
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Plate 5-2C
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Plate 5-2D
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Plate 5-2E
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Plate 5-2F
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Plate 5-2G
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Plate 5-2H
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Plate 5-2J
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Plate 5-3
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Plate 7-1A
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Hydrologic calculations for Pasture Pond (Appendix 7-3)
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Riparian Vegetation (Appendix 3-1)
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Vegetation Resource Map (Plate 3-3)
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Revised Drilling Plan (Appendix 6-5)
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Plate 8-2
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Plate 8-3
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Plate 8-4
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Plate 8-5
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Revised Bond Calculations
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Hydrologic Calcs for the 36" cmp north of the Coarse Refuse Toe Pond (appx 7-3)

Any other specific or special instructions required for insertion of this proposal into the Mining and Reclamation Plan?