0007

SUNNYSIDE COGENERATION ASSOCIATES
Post Office Box 10
East Carbon, Utah 84520
(801) 888-4476
(801) 888-2538 Fax

RECEIVED
AUG 16 1995
DIV. OF OIL, GAS & MINING

August 15, 1995

Ms. Pamela Grubaugh-Littig
Division of Oil, Gas and Mining
3 Triad Center - Suite 350
Salt Lake City, UT 84180-1203

#2 & #5
Copy Daron, Joe, Randy

RE: Permit No. ACT / 007 / 035 : Sunnyside Cogeneration Associates
Permit Submittal Associated with NOV 93-13-2-1

Dear Pam,

This submittal responds to fifteen of the deficiencies listed in the Technical Analysis received by SCA in early June. Some of these issues are among those discussed with individual members of the DOGM technical staff regarding items which had already been submitted into the permit.

These deficiencies are addressed as follows:

R645-301-142 — The disturbed area maps have been updated to reflect the reclamation work performed in 1994 on the Old Coarse Refuse Road, and the area on the southern most portion of the West Slurry Cell embankment where SCC performed temporary reclamation in the early 1990's. See Plates 3-1, 3-1A, 3-1B, 3-1C, 3-1D, 3-1E which are submitted herewith.

R645-301-342.100 — Plate 10-7 has been revised to identify approximate areas in which Pinyon and Juniper tublings will be planted. Chapter nine has been revised to describe the rock piles' intended users, size, shape and placement.

R645-301-342.200 — The seed mixtures listed in Figures 10-3 and 10-4 have been revised as suggested in the TA and as discussed with Division staff to include additional plant species which will support wildlife.

R645-301-358.510 — Plates 5-1 (A-E) have been revised to identify ownership and control of all power lines which cross through the SCA permit area. All of these power lines are currently under the ownership and control of Pacificorp / Utah Power and Light. SCA is not aware of any specific power lines within their permit boundary that have been designated unsafe for raptors.

R645-301-411	The current versions of Plate 3-1 and 3-1E show the location and extent of the coke ovens and the cemetery as well as identifying the fences or markers which are in place to reduce the potential for future disturbance. Several other plates throughout the permit show the locations of the cemetery and coke ovens.
R645-301-411	Appendix 4-5 has been added into the permit to include the entire cultural resource survey document from which some of the information previously included in Appendix 4-1 was extracted. This document was taken from the 1985 Kaiser permit and includes a survey of the entire Kaiser area at the time the survey was performed.
R645-301-724	Appendix 7-4 incorporates the Baseline Water Quality Data which was collected during 1993-1995 in accordance with the program described in Appendix 7-8. Appendix 7-8 has also been reformatted in accordance with comments received from Division staff and revised to propose a post mining monitoring program until bond termination.
R645-301-512	Plate 9-7 depicts the areas of permanent mining activity and is anticipated to be used in conjunction with the mine sequencing maps shown in Plates 9-4, 9-5, and 9-6. Plate 9-7 is not intended to be the disturbed area map. Please refer to Plates 3-1, 3-1A, 3-1B, 3-1C, 3-1D, and 3-1E for detailed boundaries of all areas proposed to be affected over the estimated total life of the coal mining and reclamation operations. The Reclamation Borrow Area located along the eastern side of the permit area is not currently disturbed beyond the limit shown. However, Plates 3-1 and 9-7 do show the entire area as future disturbed since this area is anticipated to be affected by the reclamation work.
R645-301-521.141	Plates 3-1, 3-1A, 3-1B, 3-1C, 3-1D, and 3-1E provide the boundaries of all areas proposed to be affected over the estimated total life of the coal mining and reclamation operations. A statement on these plates indicates specifically what the total number of acres proposed to be affected by surface mining and reclamation are. The Reclamation Borrow Area located along the eastern side of the permit area is not currently disturbed beyond the limit shown. However, Plates 3-1 and 9-7 do show the entire area as future disturbed since this area is anticipated to be affected by the reclamation work.

R645-301-527 Chapter 5 has been revised to include text which identifies and describes the coal handling and crushing facilities which were incorporated into the permit area in 1994. This information has been in Chapter 4 since the area was incorporated. Chapter 4 has been revised to remove this text.

R645-301-728 Figure 7-1 was revised in July 1995 to include additional information concerning the use of the underground water right available to SCA for dust control purposes. Among the information included in July was a copy of the Contract for Surplus Water Use between SCA and East Carbon City. This contract provides documentation that East Carbon City will provide the water available from the Dragerton Well for use by SCA. In accordance with typical procedures for a change in the nature of use, the State Engineer has temporarily approved the change of use until December 1995. A permanent change application is being reviewed at this time and will be incorporated into this Figure 7-1 following approval.

R645-301-352 Plates 10-3 show the intended mine sequencing plan. Areas two acres or larger are identified as to the estimated time when they will no longer be needed to conduct mining activities. There are no additional areas beyond the Old Coarse Refuse Road which are anticipated to be reclaimed within the current permit term.

The TA suggested the possibility that the areas adjacent to the Clearwater Pond and the areas to the east of the slurry ponds could be considered for contemporaneous reclamation. These areas are not scheduled for reclamation during this permit term. The area around the Slurry Ponds is being considered for a potential additional excess spoil disposal area as suggested in the TA. Early reclamation of these areas would not be prudent until it can be determined that an additional excess spoil disposal area is not needed.

R645-301-353.200 The seed mixtures listed in Figures 10-3 and 10-4 have been revised as suggested in the TA and as discussed with Division staff to eliminate less desirable species from the seed mix and develop a mixture more compatible with the land use plan.

R645-301-553 Plates 10-3, 10-4, and 10-5 have been revised to correct a mis-labeled contour, and smooth out a depression which was not intended in the reclamation plan.

References in the mining plan which indicated that refuse material below

the first bench (6290 ft) would not be eliminated over the life of the operations have been revised in previous submittals. SCA intends to recover all acceptable fuel materials from the refuse pile.

R645-301-732 Several comments from the TA Hydrologic Information section and from Technical Directive 003A have been used to make minor revisions to the text of Chapter 7 and to Plates 7-1A, 7-1B, 7-15, and 7-18 in order to more accurately reflect field conditions.

If you have any questions concerning, please feel free to call me at (801) 888-4476.

Sincerely,

UEB for Danny Mattingly

Danny Mattingly
SCA General Manager

cc: Bob Evans, NRG
Jim O'Donnell, NRG
Doug Burnham, B&W
Tom Eckstein, B&W
Alane E. Boyd, EWP
Brian Burnett, CNM
Bill Malencik, DOGM
Joe Helfrich, DOGM

Attachments

APPLICATION FOR PERMIT CHANGE

Title of Change: SUNNYSIDE COGENERATION ASSOCIATES

Permit submittal to address deficiencies listed in DOGM's TA dated May 30, 1995

Permit Number: ACT/007/035

Mine: Sunnyside Cogen. Assoc.

Permittee: Sunnyside Cogen. Assoc.

Description - include reason for change and timing required to implement: Permit submittal to address deficiencies listed in DOGM's TA dated May 30, 1995

☐ Yes	☒ No	1. Change in the size of the Permit Area? _____ acres ☐ increase ☐ decrease.
☐ Yes	☒ No	2. Change in the size of the Disturbed Area? _____ acres ☐ increase ☐ decrease.
☐ Yes	☒ No	3. Will permit change include operations outside the Cumulative Hydrologic Impact Area?
☐ Yes	☒ No	4. Will permit change include operations in hydrologic basins other than currently approved?
☐ Yes	☒ No	5. Does permit change result from cancellation, reduction or increase of insurance or reclamation bond?
☐ Yes	☒ No	6. Does permit change require or include public notice publication?
☒ Yes	☐ No	7. Permit change as a result of a Violation? Violation # 93-13-2-1
☐ Yes	☒ No	8. Permit change as a result of a Division Order? D.O. #
☐ Yes	☒ No	9. Permit change as a result of other laws or regulations? Explain:
☐ Yes	☒ No	10. Does permit change require or include ownership, control, right-of-entry, or compliance information?
☐ Yes	☒ No	11. Does the permit change affect the surface landowner or change the post mining land use?
☒ Yes	☐ No	12. Does permit change require or include collection and reporting of any baseline information?
☐ Yes	☒ No	13. Could the permit change have any effect on wildlife or vegetation outside the current disturbed area?
☐ Yes	☒ No	14. Does permit change require or include soil removal, storage or placement?
☐ Yes	☒ No	15. Does permit change require or include vegetation monitoring, removal or revegetation activities?
☐ Yes	☒ No	16. Does permit change require or include construction, modification, or removal of surface facilities?
☒ Yes	☐ No	17. Does permit change require or include water monitoring, sediment or drainage control measures?
☒ Yes	☐ No	18. Does permit change require or include certified designs, maps, or calculations?
☐ Yes	☒ No	19. Does permit change require or include underground design or mine sequence and timing?
☐ Yes	☒ No	20. Does permit change require or include subsidence control or monitoring?
☐ Yes	☒ No	21. Have reclamation costs for bonding been provided or revised for any change in the reclamation plan?
☐ Yes	☒ No	22. Is permit change within 100 feet of a public road or perennial stream or 500 feet of an occupied dwelling?
☐ Yes	☒ No	23. Is this permit change coal exploration activity ☐ inside ☐ 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, Senior Eng. 8/15/95

Signed - Name - Position - Date

Subscribed and sworn to before me this 8th day of August, 1995

Linda Ercanbrack

Notary Public

My Commission Expires: March 27, 1997

Attest: STATE OF Utah

COUNTY OF Salt Lake

LINDA ERCANBRACK
Notary Public
STATE OF UTAH
My Comm. Expires MAR 27, 1997
1121 E 3900 S C-100 SLC UT 84124

Received by Oil, Gas & Mining

AUG 16 1995

ASSIGNED PERMIT CHANGE NUMBER

Application for Permit Change
Detailed Schedule of Changes to the Permit

Title of Change: SUNNYSIDE COGENERATION ASSOCIATES Permit submittal to address deficiencies listed in DOGM's TA dated May 30, 1995	Permit Number: ACT/007/035 Mine: Sunnyside Cogen. Assoc. Permittee: Sunnyside Cogen. Assoc.

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
☐ ADD	☒ REPLACE	☐ REMOVE	PERMIT TEXT - Chapter 4
☐ ADD	☒ REPLACE	☐ REMOVE	PERMIT TEXT - Chapter 5
☐ ADD	☒ REPLACE	☐ REMOVE	PERMIT TEXT - Chapter 7
☐ ADD	☒ REPLACE	☐ REMOVE	PERMIT TEXT - Chapter 9
☐ ADD	☒ REPLACE	☐ REMOVE	FIGURE 10-3 Pinyon/Juniper/ Sagebrush Seeding Schedule
☐ ADD	☒ REPLACE	☐ REMOVE	FIGURE 10-4 Hydrophytic Vegetation Seeding Schedule
☒ ADD	☐ REPLACE	☐ REMOVE	APPENDIX 4-5 A Stratified Archeological Sample Survey
☐ ADD	☒ REPLACE	☐ REMOVE	APPENDIX 7-4 Baseline Water Quality Data
☐ ADD	☒ REPLACE	☐ REMOVE	APPENDIX 7-8 Surface and Groundwater Monitoring
☐ ADD	☒ REPLACE	☐ REMOVE	Plates 3-1, 3-1A, 3-1B, 3-1C, 3-1D, 3-1E Pre-Law, Post-Law & Future Disturbed Areas
☐ ADD	☒ REPLACE	☐ REMOVE	Plates 5-1, 5-1A, 5-1B, 5-1C, 5-1D, 5-1E Surface Facilities
☐ ADD	☒ REPLACE	☐ REMOVE	Plate 7-1A Pasture Pond and Coal Pile Sediment Pond Drainages
☐ ADD	☒ REPLACE	☐ REMOVE	Plate 7-1B Old Coarse Refuse Road Sediment Pond Drainages
☐ ADD	☒ REPLACE	☐ REMOVE	Plate 7-15 Borrow Area Pond and Clearwater Pond X-Sections
☐ ADD	☒ REPLACE	☐ REMOVE	Plate 7-18 Coal Pile Sediment Pond and Cross Section
☐ ADD	☒ REPLACE	☐ REMOVE	Plate 9-7 Areas of Permanent Mining Activity
☐ ADD	☒ REPLACE	☐ REMOVE	Plates 10-3, 10-3A, 10-3B, 10-3C, 10-3D, 10-3E Final Recl. - Phasing Plan
☐ ADD	☒ REPLACE	☐ REMOVE	Plates 10-4, 10-4A, 10-4B, 10-4C, 10-4D, 10-4E Final Recl. - Grading Plan
☐ ADD	☒ REPLACE	☐ REMOVE	Plates 10-5, 10-5A, 10-5B, 10-5C, 10-5D, 10-5E Final Recl. - Drainage Areas & Diversions Plan
☐ ADD	☒ REPLACE	☐ REMOVE	Plate 10-7 Final Reclamation - Seeding Plan
☐ ADD	☐ REPLACE	☐ REMOVE	
☐ ADD	☐ REPLACE	☐ REMOVE	
☐ ADD	☐ REPLACE	☐ REMOVE	
☐ ADD	☐ REPLACE	☐ REMOVE	
☐ ADD	☐ REPLACE	☐ REMOVE	
☐ ADD	☐ REPLACE	☐ REMOVE	

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