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October 14, 1998

TO: File

THRU: Daron Haddock, Permit Supervisor

FROM: Michael Suflita, Reclamation Specialist

RE: Technical Analysis of Permit Application, Canyon Fuel Company, LLC, Dugout Canyon Mine - Phase II, ACT/007/039-98-1, File #2, Carbon County, Utah

SUMMARY

The Division has received a number of updated submittals from the Applicant. The latest was received on September 29, 1998.

This Technical Analysis is limited to comments related to the incremental difference between the last Phase Two submittal and these latest revisions. These comments are provided in an outline, rather than standard TA format, to enable the Applicant to respond immediately and thus expedite the permitting process.

COMMENTS

1. Appendix 4-2 became 4-1 and retains its former title. A new cover sheet or first page is needed for the new Appendix 4-1.

2. Appendix 2-7 was added to the plan, however, a new tabbed divider is needed for it.

3. App. 2-7 has Plate 5-1 and so does Chapter 5 have a Plate 5-1. Two plates having different titles, subjects, and location but with the same number leads to confusion and misfiling. Please use a convention (such as is used in Chapter 4) to differentiate these plates. This is also true for Plate 2-1, similarly for App. 2-7, and Plate 2-1 in Chapter 2.

4. Page 7-83 contains a description of the culvert under the county road which is not accurate. It is described, with dimensions, as an arched culvert when it is, in fact, a circular culvert.

5. A recent site visit disclosed possible acid mine drainage near an old mine portal across the canyon from the Mine Portal and Fan Pad (designation on the new Mine Plan). It is necessary that this site be monitored as part of Dugout Mine's groundwater monitoring plan using the Groundwater Monitoring Parameters contained in Table 7-4.

6. Plate 7-5 still has a note on the bottom right that applies to the original Phase One application. It needs to be removed.

7. The following is quoted from the last TA. The situation still needs to be corrected on page 5-44. The intent is to have the four silt fences be in place at the very first, before construction is begun, and remain in place until the very last, after all construction is completed.

   "There are a minimum of four silt fences to be placed across Dugout Creek before installation of the culvert is begun. These need to remain in place until AFTER ALL construction is complete since these are the last line of defense to prevent sediment from leaving the site. Presently the plan calls for them to be removed as construction proceeds. This was called out in the last TA and has not been corrected."

8. In the last response, the cover letter indicates where in the plan the specific discrepancy is addressed. The response to R645-302-742.311, regarding the undesignated culvert, indicates that "Section 731.400 has been modified accordingly as well as ....." That section deals with Transfer of Wells and is not related to the culvert. The redesignation of the disturbed area is fine, but it's confusing as to where, if any, the text was modified.

9. Page 5-68, last paragraph, describes reclamation activities yet speaks of "installation of the culvert". This should be **removal** of the culvert and all associated fill materials.

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