



OGMCOAL DNR <ogmcoal@utah.gov>

Re: Extension Request

Steve Christensen <stevechristensen@utah.gov>

Thu, Nov 8, 2018 at 3:35 PM

To: Kit Pappas <jpappas@broncouth.com>

Cc: Daron Haddock <daronhaddock@utah.gov>, John Gefferth <jgefferth@barr.com>, OGMCOAL DNR <ogmcoal@utah.gov>, Dana Dean <danadean@utah.gov>, Justin Eatchel <jeatchel@utah.gov>

Good afternoon Kit,

We received your deadline extension request for the Emery Deep Mine Mid-term Response (Task #5670) and the corresponding As-Built drawings for the Emery No. 2 Mine. The Division grants the extension to December 31st, 2018 to submit information for the aforementioned tasks.

It should be noted that the Midterm Permit Review commenced on May 2nd of this year. The deficiencies identified during that review were sent to your office on June 20th, 2018. This most recent extension request is the second associated with the Emery Mid-Term review.

The first extension of time to respond to the Mid-term Review deficiencies and corresponding field visit was on August 20th, 2018. With this most current extension request (i.e. until December 31, 2018), approximately 6.5 months will have passed since the deficiencies identified in the Mid-term review were provided to you.

As you're aware, for many years now the Mid-term Review process is when the Division revises reclamation bond calculations as required by the State of Utah R645 rules. Your extension request letter indicates that based on a "*rough estimate of material volumes and draft bond calculations*" that the current bond is adequate. However; the Division cannot verify this claim as no information/calculations have been provided, thus it's unclear that the current reclamation bond held by the Division is adequate to ensure reclamation of the site. Maintaining adequate bond coverage at all times is a requirement for maintaining the Emery Deep Mine permit.

Please make every effort to comply with the December 31st deadline. As always, our staff is available to you to work through any and all issues associated with the Mid-term review (bond issues or otherwise).

Regards,
Steve

On Tue, Nov 6, 2018 at 2:57 PM Kit Pappas <jpappas@broncouth.com> wrote:

Please see attached.

Thank you,

Kit

John C. (Kit) Pappas

Environmental Manager

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2 attachments



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