



## State of Utah

DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF OIL, GAS AND MININGNorman H. Bangertter  
GovernorDee C. Hansen  
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Salt Lake City, Utah 84180-1203  
801-538-5340

November 1, 1991

Mr. Allen Childs  
Genwal Coal Company  
P. O. Box 1201  
Huntington, Utah 84528

*Allen*  
Dear Mr. Childs:

Re: Lack of Complete Documentation for Permit Changes, Genwal Coal Company, Crandall Canyon Mine, ACT/015/032, Folder #2, Emery County, Utah

On October 25, 1991 the Division received your application for an amendment to allow for various construction projects (Fan/Warehouse/Shotcrete) at the Crandall Canyon Mine. After a cursory review of the amendment it has been determined incomplete and is hereby denied. The submittal is being returned to you for your further attention.

The Division is concerned about the lack of detail and information supplied in this and in previous amendments submitted by Genwal. Permit changes are taken very seriously and must be properly documented. Some of the items that need to be addressed are as follows: All submittals for permit changes must be in a format ready for insertion to the Mining and Reclamation plan. Any narrative in the current plan that will be affected by the change must be updated to reflect the changes proposed. Bond calculations must be submitted to provide evidence of adequate reclamation bond. Replacement pages should contain revision dates which show when the plan was revised. An adequate number of copies of the amendment (in Genwal's case 13 copies) must be submitted for all interested agencies to review. Maps and plans must be certified.

The Division has attempted to be cooperative throughout Genwal's recent expansion projects, however, it appears that the expansion may be progressing faster than the documentation and permitting process. At this time we feel that it is imperative that Genwal complete the permit documentation for those facilities that have already been constructed prior to proceeding with additional changes. This would include supplying as-built drawings as well as updating information in chapters 3, 7, and 14.

Page 2  
Genwal Coal Company  
ACT/015/032  
November 1, 1991

Another area of concern is Genwal's apparent lack of foresight in planning for expansion. Many of the changes have come in "piece meal" rather than in a clear and concise plan for overall expansion. The State lease additions were rushed through at the last minute because Genwal was running out of room to mine. A similar situation was encountered with the haul road/loading facility expansion. Recently we were notified that you are anxious to begin secondary mining in the State leases, in an area which might cause subsidence on to the Manti LaSal National Forest. On April 22, 1991 when the permit was issued for the State leases, Genwal should have foreseen this situation and should have taken action at that time to change the permit to allow secondary mining in this area. It appears that coal resources may now be sterilized due to the lack of planning. We do not feel that this is in the State's or Genwal's best interest and encourage you to take steps to alleviate the immediate situation as well as similar situations that are inevitable in the future.

A meeting between Genwal and the Division and perhaps State Lands and Forestry appears to be needed to discuss your mining plans. Current and future mining maps should be reviewed and your plans adjusted accordingly. We encourage you to schedule a meeting at your convenience.

If you have questions regarding the Division's concerns or requirements please call.

Sincerely,



Lowell P. Braxton  
Associate Director, Mining

Enclosure

cc: D. Haddock, DOGM  
Bteam  
Dick Mitchell, State Lands  
George Morris, USFS

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