

**GENWAL COAL COMPANY**

March 9, 1994

Mr. Daron Haddock  
Division of Oil, Gas & Mining  
3 Triad Center, Suite 350  
355 West North Temple  
Salt Lake City, UT 84180-1203

MAR 10 1994

RE: Permit #ACT 015-032  
Genwal Coal Company  
Incidental Boundary Change  
Deficiencies, ACT/015/032-94B, Folder 3

Dear Mr. Haddock:

As requested by your letter of March 3, 1994, please find enclosed that information needed as required. These items and concerns are addressed in the order as reflected within the body of your letter. They are as follows:

- 1) "Plate 1-1A does not show Federal Coal Lease UTU-68082 and its relation to the IBC. The IBC area can mistakenly be assumed to be part of the adjacent state lease ML-25169."

Please find enclosed fourteen (14) copies of the revised Plate 1-1. This Plate was changed to reflect the new Lease UTU-68082 including the IBC. Plate 1-1 was changed instead of Plate 1-1A as decided in a telephone conversation with you and the Mr. Jim Smith.

- 2) "Discrepancies in the acreage for the IBC will need corrected. Appendix 1-1 lists acreage as 152.18 acres while page 4 of the introduction lists 143.91 acres."

Please find enclosed fourteen (14) copies of page 4 of the Introduction. This page was changed to reflect the accurate acreage within the IBC, that being 152.18 acres.

- 3) "The submittal includes a legal description of the IBC, but this description is not formatted to be inserted into the MRP. It is simply an unnumbered page. The description of the IBC needs to be included in Chapter 1 in the right-of-entry section."

Please find enclosed fourteen (14) copies of **Description of I.B.C.** This document was revised to reflect which appendix it belonged in. As far as describing the IBC within Chapter 1, see Page 1-12a which was submitted on February 11, 1994.

- 4) "The Division will need to receive right-of-entry information for the new lease."

Please find enclosed fourteen (14) copies of the coal lease agreement for Lease UTU-68082. This document is to be included into Appendix 1-1.

- 5) "Genwal must commit to only conduct first mining in the IBC area."

See page 5-10 submitted on February 8, 1994. In this page the commitment has been made that no retreat mining will take place within the IBC until the new Lease UTU-68082 amendment has been approved.

- 6) "Genwal must demonstrate that first mining in the IBC will not result in any subsidence. The information supplied to the division will include but not be limited to the coal's strength and the pillar size and safety factor."

Please find enclosed fourteen (14) copies of the revised page 5-13 and a new page 5-13a.

Please find enclosed fourteen (14) copies of the addendum to Appendix 5-3 showing the safety factor for the IBC.

- 7) "The applicant did not state if the subsidence monitoring program would need to be modified to detect ground movement associated with mining in the IBC area. Genwal must discuss the effects mining in the IBC area will have on the subsidence monitoring program."

Please find enclosed fourteen (14) copies of the revised pages 5-25 and 5-26.

Should you have any questions or need additional information, please contact me at 687-9813.

Sincerely,



GENWAL COAL COMPANY  
Larry W. Johnson  
Engineer

# APPLICATION FOR PERMIT CHANGE

Title of Change: DEFICIENCIES - IBC

Permit Number: ACT 1 015 1032

Mine: CRANDALL CANYON

Permittee: GENVAL COAL CO.

Description, include reason for change and timing required to implement: CHANGES MADE TO ADDRESS DOGM LETTER OF MARCH 3, 1994. TIMING IS CRITICAL - MINING OF SECT 36 CLOSE TO COMPLETS. MINING SECTION WILL NEED A PLACE TO MINE 30 TO 45 DAYS

- |   |  |   |
|---|--|---|
| <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No            | 1. Change in the size of the Permit Area? <u>152.18</u> acres <input checked="" type="checkbox"/> increase <input type="checkbox"/> decrease. |
| <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> No | 2. Change in the size of the Disturbed Area? _____ acres <input type="checkbox"/> increase <input 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 type="checkbox"/> Yes            | <input checked="" type="checkbox"/> No | 9. Permit change as a result of other laws or regulations? Explain: _____   |
| <input checked="" type="checkbox"/> Yes | <input 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 type="checkbox"/> Yes            | <input checked="" 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 checked="" type="checkbox"/> Yes | <input 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?      |

Attach 24 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 respects with the laws of Utah in reference to commitments, undertakings, and obligations, herein.

Jaymie Dot 3-9-94  
Signed - Name - Position - Date

Subscribed and sworn to before me this 9th day of March, 1994.  
Rosine Magors  
Notary Public

My Commission Expires: May 28, 1997  
Attest: STATE OF Utah  
COUNTY OF Garfield



Received by Oil, Gas & Mining

MAR 10 1994

OIL, GAS & MINING

DIVISION OF OIL, GAS & MINING  
STATE OF UTAH  
COMM. EXP. 5-28-97 ASSIGNED PERMIT CHANGE NUMBER

