

GENWAL COAL COMPANY

May 9, 1994

RECEIVEDMAY 9 1994
DIVISION OF
OIL GAS & MINING

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

RE: Permit #ACT 015-032
Concerns needing addressed prior to Publication
Concerning the LBA#9 Amendment.

Dear Mr. Haddock:

As decided in a meeting with you and your staff on Tuesday, May 3, 1994, please find enclosed three (3) copies of those items needing changes to gain approval for publication and determination of a administratively complete Mine and Reclamation Plan.

As outlined, the following concerns needed to be addressed:

1. Chapter 1: Right of entry information was missing.

3 copies of a revised chapter 1, minus the title page, index, are included in this submittal.

3 copies of the coal lease agreement between the Bureau of Land Management and Nevada Electric Investment Company and Intermountain Power Agency are included in this submittal.

Also included are 3 copies of verification of land ownership of the ARCO (Dellenback) property, now owned by NEICO and IPP.

2. Concerns on the Raptor survey at the Crandall Canyon Mine:

3 copies are included of the raptor survey performed by Mr. Bill Bates and Mr. Scott Richardson of the Utah State Department of Wildlife Resources on June 29, 1993.

3. Subsidence extends beyond the permit boundaries:

3 copies of the revised plate 5-2, Mine Projections, is included in this submittal. The drawing shows the limits of mining within the new lease UTU-68082.

3 copies of the revised Plate 6-2, Maximum Limit of Possible Subsidence, is included in this submittal.

3 copies of the revised Figure 5-9, page 5-28 to chapter 5, is included in this submittal.

4. The PHC needs to be brought up to date.

3 copies of the modified Probable Hydrologic Consequence is included in this submittal.

5. Acid and Toxic analysis of roof and floor in section 36 of State Lease ML-21569 has been committed to by Genwal but results are not evident within the MRP.

On Wednesday, May 4, 1994, Genwal employees sampled both the roof and floor at 3 locations within Section 36. The samples were then delivered to Commercial Testing & Engineering Co. to be analyzed. Included in this submittal is a letter from CTE (not to be incorporated into the MRP) verifying receipt of the samples and anticipation of results. When the results are received by Genwal Coal, that information will be incorporated within the MRP.

6. Drawings: Boundary of Federal Lease UTU-68082 needs to be shown correctly. The permit boundary needs to be shown correctly. Certification needs added to those drawings needing certified.

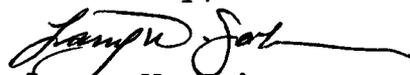
3 copies of several maps showing the correct boundaries and certification are included in this submittal.

Other changes made accompanying this submittal are:

1. 3 copies of revised pages 4-2 and 4-3 are included.
2. 3 copies of revised pages 7-2 and 7-14 are included.
3. 3 copies of the revised Table of Contents for Volume 2 are included.

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

Sincerely,



Larry W. Johnson
Genwal Coal Company

APPLICATION FOR PERMIT CHANGE

Title of Change: CHANGES FOR ADMINISTRATIVE COMPLETENESS FOR LBA AMENDMENT

Permit Number: ACT 015 032

Mine: CRANDALL CANYON

Permittee: GENWAL

Description, include reason for change and timing required to implement: CONCERNS ADDRESSED AS PER DOLGM/GENWAL MEETING ON 5-3-94

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	1. Change in the size of the Permit Area? <u>2979.5</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 checked="" type="checkbox"/> Yes	<input 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 checked="" type="checkbox"/> Yes	<input 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?

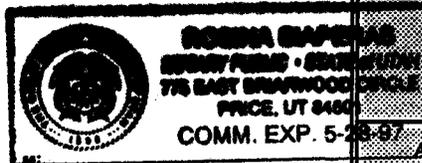
Attach 3 complete copies of proposed permit change as it would be incorporated into the Mining and Reclamation Plan.

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

James W. Johnson ENGINEER 5-9-94
Signed - Name - Position - Date

Subscribed and sworn to before me this 9th day of May, 19 94.
Debra J. Simpson
Notary Public

My Commission Expires: 5-28, 19 97
Attest: STATE OF UT
COUNTY OF Garfield



Received by Oil, Gas & Mining

MAY 9 1994

DIVISION OF OIL, GAS & MINING

ASSIGNED PERMIT CHANGE NUMBER

