

GENWAL COAL COMPANY

June 2, 1994

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

JUN - 2 1994

RE: Permit # ACT 015-032
Genwal Coal Company
Technical Deficiencies Submittal

File
ACT/015/032 # 2
Copy PAM (all)

Dear Mr. Haddock:

Please find enclosed fourteen (14) copies of the material to be added to our LBA#9 submittal in response to completeness review letter dated 12 May 1994. Make the appropriate changes as outlined in the "Detailed Schedule of Changes to the Permit."

The responses to the Deficiencies were as follows:

R645-301-114

Deficiencies:

- 1) Names of persons that own or control Nevada Power, including the dates that they assumed their positions have been added to plan.
- 2) Officers and directors of NEICO corrected on 10 May submittal.
- 3) MSHA ID's and dates of issuance have been added to plan.
- 4) Wording regarding operation of ACT/007/012 has been corrected.

Completeness Review
Response

R645-301-114

Deficiencies:

- 1) LBA ROW information was corrected in the 10 May submittal.
- 2) LBA shown accurately on all plates.

R645-301-321

Deficiencies:

- 1) Plan has been revised to include black and white aerial photography.

R645-301-322

R645-301-333

Deficiencies:

- 1) Letters from USFS EA has been included.
- 2) 645 regulations do not prohibit surface subsidence.
- 3) Aerial survey will be conducted every three years for identification of cliff nesting raptors.
- 4) Plate 3-1A has been updated to show USFS raptor survey.

R645-301-522

Deficiencies:

- 1) The Resource Recovery Protection Plan has been

Completeness Review
Response

referenced for Federal Coal.

R645-301-525

Deficiencies:

- 1) All subsidence areas are included in the permit area.
- 2) All subsidence data submitted in annual reports indicate that no measurable subsidence has occurred at Genwal Coal Company. A 20 degree angle of draw is believed to be conservative at Genwal Coal company even if subsidence was to occur. It is a matter of academic debate which model, plastic or elastic would best be suited for specific applications. We contend that the model Terra Tec used was applicable for Genwal Coal Company, it was an elastic model with modifiers. Even if the maximum predicted subsidence of 3" did occur the clastic material in our overburden in all probabilities would enable any fractures to be self healing.

Genwal Coal company has approval from the USFS and DOGM to use a 20 degree angle of draw and will continue to do so unless additional new data indicates that a 20 degree angle of draw is not adequate.

- 3) Biannually has been changed to every two years.

R645-301-612

Deficiencies:

- 1) All required maps plans and Cross Sections have been certified.

R645-301-622

Completeness Review
Response

622.1

Deficiencies:

- 1) Statement has been corrected.
- 2) All known drill locations have been located on Plate 5-2.
- 3) All known drill hole locations are shown on Plate 5-2. All drilling data has been included in appendix 6-5.
- 4) All drill hole data has been included in appendix 6-5.
- 5) Plate 5-2 shows location of proposed in-mine holes.

R645-301-622.2

Deficiencies:

- 1) Deleted all references to 5-2C.
- 2) All Drill hole data has been included in appendix 6-5.
- 3) All applicable reliable data has been included.
- 4) Applicable reliable data has been included.
- 5) Clarification between surface hole DH2 and underground DH2 has been included.
- 6) Verbiage has been added to clarify.
- 7) Verbiage has been corrected.

R645-301-624.3

624.32

Completeness Review
Response

Deficiencies:

- 1) Location of original samples unknown. Three additional samples taken and addressed in 10 May submittal.

R645-301-632

Deficiencies:

- 1) Plate 6-2 and Figure 5-9 have been corrected.

R645-301-712

Deficiencies:

- 1) All required maps plans and cross sections have been certified.

R645-301-722

Deficiencies:

- 1) Plates 7-12, 7-14, 7-15, 7-16, and 6-1 have been corrected.
- 2) Plate 7-12, 7-13, 7-14 have been corrected.

Completeness Review
Response

R645-301-724

724.1

724.2

728

730

731.21

731.22

731.600

Deficiencies: Addressed by Earth Fax.

Should you have any questions please call.

Sincerely;



R. Jay Marshall P.E.
Chief Engineer
Genwal Coal Company

cc: File

Application for Permit Change

DETAILED SCHEDULE OF CHANGES TO THE PERMIT

Title of Change: *Response to Completion review to
LBA #9 9301 Folder #5*

2 June 94

Permit Number: *ACT 1015 1032*

Mine: *Grandall Canyon*

Permittee: *General Coal Co.*

Provide a detailed listing of all changes to the mining and reclamation plan which will be required as a result of this proposed permit change. Individually list all maps and drawings which are to be added, replaced, or removed from the plan. Include changes of the table of contents, section of the plan, pages, or other information as needed to specifically locate, identify and revise the existing mining and reclamation plan. Include page, section and drawing numbers as part of the description.

			DESCRIPTION OF MAP, TEXT, OR MATERIALS TO BE CHANGED
<input checked="" type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	<i>Page 1-4 A</i>
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	<i>Page 1-5</i>
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	<i>Page 1-6</i>
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	<i>Page 1-7</i>
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	<i>Page 3-1 A Plate</i>
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	<i>Page 3-6 to 3-11</i>
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	<i>Page 3-21</i>
<input checked="" type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	<i>To Appendix 3-3 Letters from USFS & UDWR</i>
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	<i>Page 5-7</i>
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	<i>Page 5-25</i>
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	<i>Page 6-4 to 6-8</i>
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	<i>PLATE 7-12</i>
<input checked="" type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	<i>To Appendix 6-5 drill logs & drill report</i>
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	<i>PLATE 7-14</i>
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	<i>PLATE 7-15</i>
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Any other specific or special instructions required for insertion of this proposal into the Mining and Reclamation Plan?

Application for Permit Change Detailed Schedule of Changes to the Permit

Title of Change: LBA No. 9 Completeness Review Responses.	Permit Number: ACT/015/032
	Mine: Crandall Canyon Mine
	Permittee: Genwal Coal Company

Provide a detailed listing of all changes to the mining and reclamation plan which will be required as a result of this proposed permit change. Individually list all maps and drawings which are to be added, replaced, or removed from the plan. Include changes of the table of contents, section of the plan, pages, or other information as needed to specifically locate, identify and revise the exiting mining and reclamation plan. Include page, section and drawing numbers as part of the description.

			DESCRIPTION OF MAP, TEXT, OR MATERIALS TO BE CHANGED
<input checked="" type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Appendix 7-49, Mitigation for Blind Canyon Creek
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Appendix 7-42, Seep and Spring Water Quality Data
<input checked="" type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Appendix 7-3, Additional water quality data to be added to this appendix.
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Chapter 7, Hydrology
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Appendix 7-15, Probable Hydrologic Consequences
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Appendix 7-44, Replace cover sheet only.
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Plate 7-16, Stream Monitoring Stations Crandall Canyon Mine
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Table of Contents: Volume 6
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Any other specific or special instructions required for insertion of this proposal into the Mining and Reclamation Plan?
 Changes to last submitted text in Chapter 7 are highlighted.

Jerry Herbst
Assumed position December 13, 1990

John L. Goolsby
Assumed position January 10, 1991

Richard L. Hinkley
Assumed position May 15, 1991

Principle Shareholders of NEICO:

All stock of NEICO is owned by
Nevada Power Company
6226 West Sahara Ave.
P.O. Box 230
Las Vegas, Nevada 89151

Names under which Joint Owners and Principal shareholders have previously operated mining activities (R645-301-112-321):

IPA is currently engaged in the reclamation of the Horse Canyon Mine, located in Emery county, Utah.

Names of officers, directors of Nevada Electric Investment Company:
(R645-301-112-310)

Officers of Nevada Power Company:

Charles A. Lenzie, Chairman of the Board and CEO
Assumed position October 14, 1993

James C. Holcombe, President and COO
Assumed position October 14, 1993

David G. Barneby, Vice-President
Assumed position October 14, 1993

Gloria B. Weddle, Vice-President
Assumed position October 14, 1993

Cynthia Gilliam, Vice-President
Assumed position October 14, 1993

Richard L. Hinckley, Vice-President
Assumed position October 14, 1993

Steven W. Rigazio, Vice-President
Assumed position October 14, 1993