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STATE OF UTAH
NATURAL RESOURCES
Oil, Gas & Mining

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4241 State Office Building • Salt Lake City, UT 84114 • 801-533-5771

February 1, 1984

Mr. Vernal Mortensen
Vice-President, Utah Operations
Coastal States Energy Company
411 West 7200 South
Midvale, Utah 84047

RE: Technical Analysis
Southern Utah Fuel Company
Convulsion Canyon Mine
ACT/041/002, Folder No. 2
Sevier County, Utah

Dear Mr. ^{Vernal} Mortensen:

On December 23, 1983, the Division submitted a Draft Final Technical Analysis (TA) for the Convulsion Canyon Mine to the Office of Surface Mining (OSM) for review. This TA was revised from the original Draft TA submitted to OSM in October 1983 to incorporate new technical information submitted by Southern Utah Fuel Company (SUFCO). The Draft Final TA contained five stipulations for permit approval, whereas the original Draft TA had contained thirteen (13) stipulations.

The Division has been informed by OSM that two of the remaining five stipulations are unacceptable as final permit stipulations and must be addressed prior to issuance of final permit approval. Therefore, SUFCO is requested to provide the following information as soon as possible, but no later than February 15, 1984:

Stipulation 817.111-.117-(1)-SL

1. The applicant shall submit a consolidated Reclamation Plan, including information from the MRP in Volume 5, pages 35a-37, Volume 8, pages 12n-o and 18. The following items shall also be incorporated into the Plan: (1) an assessment or revision of the species mix in response to DWR's October 24, 1983 comments (letter attached to TA); (2) specific statements that all recommendations in the plan will be implemented; (3) approximate calendar dates of seeding and planting; (4) specific mulching practices, including type, amount and location, for all reclaimed areas; and (5) a commitment to use methods and sample adequacy levels used in establishing the reference

area in the monitoring of revegetation success. If methods used in reclaiming the breakout areas will differ from the general Reclamation Plan, these differences shall be discussed in a separate paragraph following the generalized Plan.

The information required under Stipulation 817.111-.117-(1)-SL is considered basic information required to adequately assess the feasibility of reclamation of the disturbed area.

Stipulation 817.56-(1-5)-DD

The applicant shall supply more detailed information concerning reclamation of the fill areas as follows:

1. Provide calculations establishing riprap size to be used in diversions and stream channels.
2. Submit peak flow calculations from disturbed areas.
3. Approximately 3.2 acres along the length of the stream channel has no runoff control. Plans shall be submitted to provide controls for this area so that no sediments reach the stream channel.
4. Plans must be submitted showing how disturbed and undisturbed drainage will be separated above the confluence of Mud Spring Hollow and East Spring Canyon.
5. A plan to monitor water quality and the implemented reclamation practices must be submitted.

The information outlined under Stipulation 817.52-(1)-DD is considered basic information required to adequately assess the feasibility of reclaiming the fill area which provides the platform for the mine pad and facilities.

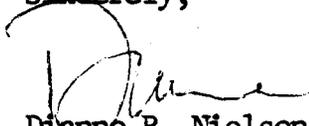
In discussing the proposed reclamation plans pertaining to the fill area with OSM, it was established that the fill area should be reclaimed in such a manner that erosion rates are not excessive and do not contribute sediments to natural drainages in greater proportion than would naturally occur if mining had not taken place. Therefore, the reclamation plans should incorporate designs to control downcutting of the recontoured fill on a permanent basis or provide for sediment control.

Suggestions to control downcutting for the type of reclamation proposed for SUFCO's fill area consists of installing a rock chimney through the length of the fill, establishing the stream channel to one side of the canyon in bedrock, or removing the fill so that the stream lies in its original channel.

Mr. Vernal Mortensen
ACT/C41/002
January 25, 1984
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Your cooperation in facilitating the final stages of permit review and approval for the Convulsion Canyon Mine is greatly appreciated. As always, please don't hesitate to contact James W. Smith, Jr., or Susan C. Linner of my staff should you have questions.

Sincerely,



Dianne R. Nielson
Director

DRN/SCL:btb

cc: Allen Klein, OSM, Denver
Ken Payne, SUFCO
R. Daniels, DCGM
S. Linner, DOGM
D. Darby, DOGM
J. Smith, DOGM