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**Southern Utah  
Fuel Company**

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Subsidiary of  
Coastal States  
Energy Company

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**APR 18 1985**

**DIVISION OF OIL  
GAS & MINING**

April 15, 1985

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

Dear Susan:

For several months, we have been investigating the adequacy of our electrical power supply at SUFCo in consideration of a planned conversion to longwall mining methods later this year. Both an electrical consulting firm and Utah Power and Light Company (UP&L) have assisted us in this study. This recently completed study shows that the existing 25 kV supply is indeed inadequate and must be replaced with a 69 kV distribution line.

Utah Power and Light Company's existing corridor will be used for the new line and we understand their right-of-way clearances are all in order. However, to conform with their new substation safety requirements, the substation pad at our minesite must be slightly modified to include a buried ground-grid both inside and outside the substation fence. No new area will be disturbed. However, an excavation into the bottom of the hillside immediately east and south of our present substation will be necessary to allow installation of the ground-grid to UP&L's code specifications. To ensure power will be available for the longwall equipment when it is installed next fall, the modification to the substation must be made this coming summer.

We assume we must now alter our Mining and Reclamation Plan to show the new substation modification. As before, the entire area will be covered with coarse gravel to prevent both vegetation growth and sediment contribution. In addition, a containment berm will be included to prevent flow of transformer oil away from the site in the event of an accidental spill. We still propose to keep the area exempt from flow through the main sediment pond.

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Engineering design of the substation area modifications is in progress at this time. A detailed plan of the construction activity proposed in the substation area will be submitted to the Division before May 1, 1985 for review. We expect Division approval will be required prior to June 1, 1985 to allow construction scheduling during the summer.

This preliminary notification of the forthcoming submittal is provided because we know you are in the midst of final overall M&RP plan approval through OSM and Washington, D.C. If you anticipate the need to include consideration of the substation modifications in your final dealings with OSM, let me know right away. Our preference would be for you to proceed with the permitting process and later (by July 1, 1985) approve the substation work as a minor modification to the overall Mining and Reclamation Plan.

Sincerely,

SOUTHERN UTAH FUEL COMPANY



Kerry A. Frame  
Mine Services Manager

KAF:cfc