



0042

STATE OF UTAH
NATURAL RESOURCES
Oil, Gas & Mining

Norman H. Bangerter, Governor
Dee C. Hansen, Executive Director
Dianne R. Nielson, Ph.D., Division Director

355 W. North Temple • 3 Triad Center • Suite 350 • Salt Lake City, UT 84180-1203 • 801-538-5340

August 13, 1985

CERTIFIED RETURN RECEIPT REQUESTED
(P402 457 214)

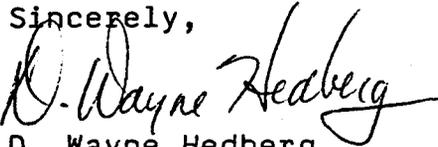
Mr. Ken Payne
V. P. & General Manager
Southern Utah Fuel Company
P. O. Box P
Salina, Utah 84654

Dear Mr. Payne:

RE: Approval of MRP Amendment, Minor Modification to Underground Mining and Development Plan, Convulsion Canyon Mine, ACT/041/002, #4, Sevier County, Utah

Southern Utah Fuel Company's July 16, 1985 response to Division questions for the MRP amendment concerning minor modification of a portion of the underground mining and development plan has been reviewed by the Division. The response and proposed plans are acceptable and approval is hereby granted by the Division to proceed with the minor underground development change.

Thank you for your cooperation in this matter. Please contact me or Randy Harden should you have any questions.

Sincerely,

D. Wayne Hedberg
Permit Supervisor/
Reclamation Hydrologist

REVIEW CHRONOLOGY:

- | | |
|--|--|
| <p>A. Operator Submittals</p> <ol style="list-style-type: none"> 1. 6/17/85 2. 7/16/85 | <p>B. DOGM Responses</p> <ol style="list-style-type: none"> 1. 7/3/85 2. 8/13/85 |
|--|--|

DH/btb

cc: Allen Klein
Samuel R. Rowley
Steve Falk
Lowell Braxton
Randy Harden
Bart Kale

0338R-31

MRP REVISION/NOV TRACKING FORM
(Revised: 3/28/85)

Type of Proposal: X COAL NONCOAL

 Exploration
 NOV/CO Abatement, NOV # , Abatement Deadline
 MRP Revision
X MRP Amendment

??

Issuing Inspector

Title of Proposal: Minor Modification Underground Mining Plan

Company name: SUFECO Project/ Mine Name: Convulsion Cyn.

File # (PRO/ACT): 041/002 Disturbed (Fed/State/Fee): 1 1
 (CEP/EXP) Acres

Assigned Reviewers:	Review Time (hrs):	OTHER AGENCIES: (# of copies & date)
(Hydrology) <u>TJS</u>	<u>> 1.0</u>	OSM <u>(1)</u>
(Wildlife/Veg.) <u> </u>	<u> </u>	USFS <u> </u>
(Engineering) <u>Randy H. (?) ^{Rel. 7/30}</u>	<u>< 1.0</u>	BLM <u> </u>
(Soils) <u> </u>	<u> </u>	Health <u> </u>
(Geology) <u>TJS</u>	<u>> 1.0</u>	History <u> </u>
		H2O Rts <u> </u>
		Wildlife <u> </u>

DATES:

- (a) Initial Plan Received June 17/85 (d) Optr. Resubmission
- Tech Review Due July 8/85 (latest) Tech Review Due
- Tech Review Complete Tech Review Complete
- DOGM Response Sent July 3/85 DOGM Response Sent
- response due July 17/85
- (b) Operator Resubmission July 16/85 (e) Bond Revised
- Tech Review Due July 31/85 (if possible) Amount (\$)
- Tech Review Complete
- DOGM Response Sent (f) Cond'l. Approval
- (c) Operator Resubmission Stipulations Due
- Tech Review Due Stips Received
- Tech Review Complete Final Approval
- DOGM Response Sent (g) MR-9 Received
- MR-9 Acknowledged

COMMENTS:

NOTE (INSPECTORS): Please attach a copy of the NOV issued to the abatement plan when received from the operator.

NOTE (REVIEWERS): Please prepare review comments in a format referencing the appropriate regulation or statute. State the deficiency as well as the minimum requirement necessary to demonstrate compliance. Fill in the # of hours spent in review by discipline. Return completed form to the Special Permits Supervisor when complete.

Review Copy



**Southern Utah
Fuel Company**

P.O. Box P
Salina, Utah 84654
(801) 529-7428

Division of
Coastal States
Energy Company

July 16, 1985

RECEIVED

JUL 16 1985

DIVISION OF OIL
GAS & MINING

Mr. D. Wayne Hedberg
Permit Supervisor
Division of Oil, Gas & Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, UT 84180-1203

Dear Mr. Hedberg:

We received your letter regarding the BLM's approval of our underground gob disposal program on July 9, 1985. You pointed out that this type of activity should not normally cause significant concern to the Division. We agree. Indeed, the BLM approval states the project "will have no effect on the surface environment and no environmental analysis is necessary as per NEPA."

However, for reasons which are unclear to us, you have requested that we provide the Division further information on this matter anyway. To make the situation even more puzzling, your request is for information which already has been provided in the SUFCo M&RP/permit application package. The information was submitted in response to requests made during your now-six-year-long permit application review process. The Division has already made a determination that the information is complete and technically adequate.

In response to your request (and to reacquaint you with the permit application), a description of the appropriate M&RP content locations is provided below.

With regard to your request that we address any acid or toxic-forming materials and discuss the impact on ground water quality:

1. Analyses of the strata above and below the seam, which makes up the "gob" material, have been provided on pages 68 through 147 in Volume 3 of the M&RP/PAP.
2. Additional discussion under "Rock Characteristics, Acid-Toxic, Pyrite, Clay, and Alkalinity" is found on page 6 of the 1981 Geology supplement in Volume 7 of the M&RP/PAP.

Mr. D. Wayne Hedberg
July 16, 1985
Page 2

3. A detailed description of the effects of the mining operation on ground water is included on pages 59 through 62 of the 1980 hydrology study in Volume 4.
4. Further discussion on the impact to ground water quality was added to the M&RP in the hydrology supplement in the back of Volume 4.

With regard to your request for information whether the program has MSHA approval and meets the requirements of UMC 784.25, information was already sent to your office in:

1. The 1980 response to a U.S.G.S. comment found on page 265 of Volume 3.
2. The 1981 response to a Division comment under 784.11(b) in Volume 7.
3. It is our understanding UMC 874.25 applies to Coal Processing Waste such as is typically generated in heavy media wash plants. The material being handled near 1R1W is underground development waste as covered under UMC 874.19. The comments under 784.11(b) in combination with the hydrology reports in Volume 4 and the subsidence reports in Volume 5 satisfy the requirements of UMC 874.19.

The potential effects on subsidence of boundaries between mined and unmined areas is discussed in detail in the subsidence section of Volume 5. This particular situation would not be expected to be any different with respect to subsidence than would occur in an area where the crews are forced to abandon a localized area due to adverse mining conditions.

Should you have comments or questions pertaining to this response, please contact Kerry Frame or me at 637-4880.

Sincerely,
SOUTHERN UTAH FUEL COMPANY


Ken Payne
V. P. & General Manager

KAF:cfc

xc: Steve Falk, BLM
John Garr, CSEC
Diane Nielson, DOGM



STATE OF UTAH
NATURAL RESOURCES
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355 W. North Temple • 3 Triad Center • Suite 350 • Salt Lake City, UT 84180-1203 • 801-538-5340

July 3, 1985

CERTIFIED RETURN RECEIPT REQUESTED
(P402 457 197)

Mr. Wesley K. Sorensen
Chief Engineer
Southern Utah Fuel Company
P. O. Box P
Salina, Utah 84654

Dear Mr. Sorensen:

RE: MRP Amendment, Minor Modification to Underground Mining and
Development Plan, Convulsion Canyon Mine, ACT/041/002, #3,
Sevier County, Utah

On June 17, 1985, the Division received a copy of an approval letter from the Bureau of Land Management (BLM) with regard to a request from Southern Utah Fuel Company (SUFCO) to modify a portion of their underground mining and development plan for the One West area. A copy of SUFCO's request for change was attached to the approval. Normally, this type of minor underground modification would not cause significant concern with the Division. However, upon review of this proposal, it became apparent that there were some areas which the plan did not address, nor did the BLM approval make reference to the same. Consequently, the operator is requested to address the following regulations as to the expected impacts from the gob disposal activities in 1R1W.

UMC 817.48 Acid and Toxic-Forming Materials

Please refer to existing MRP data or provide an analysis of the gob material which will be disposed of in the sections noted above. Ground water is expected to permeate this material and the impact on the quality of the ground water resource should be discussed.

Page 2

Mr. Wesley K. Sorensen
ACT/041/002
July 3, 1985

UMC 817.71(m) Underground Development Waste and Excess Spoil
Returned to the Underground Workings

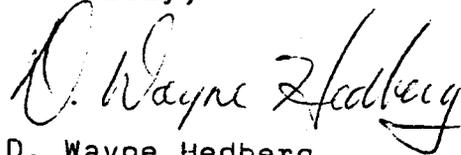
This activity must meet the requirements under UMC 784.25 and be approved by MSHA.

UMC 817.121-.126 Subsidence Control

The operator must determine and evaluate the effects in the subsidence control plan as a result of leaving unmined pillars in 1R1W (see also UMC 784.20).

The operator should submit a copy of the plans provided to MSHA in addition to a copy of their approval letter for the same. The operator is requested to provide a response to the questions outlined above by July 17, 1985. Should you have comments or questions pertaining to the review, please contact me or Randy Harden of the Division's technical staff. Thank you for your cooperation in resolving these concerns.

Sincerely,



D. Wayne Hedberg
Permit Supervisor/
Reclamation Hydrologist

btb

cc: Allen Klein
Samuel R. Rowley
Steven Falk
Lowell Braxton
Randy Harden
Bart Kale

8992R-79 & 80

SUFCO MINOR MOD - UNDERGROUND GOB
DISPOSAL PLAN.

JIS - I SEE NO PROBLEMS ASSOCIATED
7/26/85 WITH PROPOSED DISPOSAL

JRH - RESPONSE TO THE LETTER BY REFERENCING
7/31/85 MATERIAL PREVIOUSLY PROVIDED IS ADEQUATE.
IT SHOULD BE NOTED TO THE OPERATOR
THAT IF THERE HAD BEEN THESE REFERENCES
TO THE MINE PLAN IN THE FIRST PLACE,
OUR CONCERNS AND COMMENTS WOULD HAVE
BEEN MET.