0002
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

January 11, 1988

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

Dear Mr. Payne:

Re: Review of PAP Amendment, Construction of New Ventilation Portal, Quitchupah Canyon, Southern Utah Fuel Company, Convulsion Canyon Mine, ACT/041/002-87B, File Folder #2, Sevier County, Utah

The Division has completed its review of the above-referenced PAP amendment. The plan was received November 25, 1987 and was forwarded to other appropriate permitting agencies for review and comment. The proposal has been determined incomplete and cannot be approved at this time. Please refer to the attached technical review memoranda for an explanation of the information still required before approval can be considered for this permit change application.

Upon receipt of the requested information, the Division will proceed with the review process. If possible, please provide your response by February 15, 1988. Thank you for your assistance in completing this permitting activity. Please contact me, or Susan Linner, Permit Supervisor, should you have questions or concerns pertaining to this review.

Sincerely,

D. Wayne Hedberg

D. Wayne Hedberg
Data Management Coordinator

DWH/jr
Attachments
cc: J. Dryden
R. Hagen
R. Foisey
G. Morris
D. Pendleton
P. Rutledge
K. Taylor
S. Linner
P.F.O.
8992R/21

December 3, 1987

TO: Memo to File

FROM: James S. Leatherwood, Reclamation Soils Specialist

RE: New Ventilation Portal; Determination of Completeness and Technical Analysis, Convulsion Canyon Mine, Southern Utah Fuel Company, ACT/041/002-87B, Sevier County, Utah

The above-mentioned plan, submitted on November 25, 1987, has been reviewed and found not to be complete. The operator's request for a topsoil removal variance is not acceptable at this time. Further soil characterization is required for the removal variance and reclamation plan determination.

Determination of Completeness

UMC 783.21 Soil Resources Information - JSL

The operator's request for a topsoil removal variance is not acceptable at this time. The November 25, 1987 submittal does not contain an adequate soil survey to determine this variance.The soil survey, found in Volume 5 of the approved PAP, identifies the proposed disturbance soil as soil U. Soil U is identified as a Fine-loamy, mixed, Typic Cryochrept with 40% unit H, 20% unit O, and 15% rock outcrop. Due to the large variation of soils in this complex, it is difficult to characterize the soil at the specific proposed disturbance area. The native soil should be identified as only one of the soil types (i.e., U, H, O or Rock Outcrop).

In accordance with UMC 817.22(g) an exception to topsoil and subsoil may be granted if the operator can show that: A) Removal is impractical or unsafe, due to steepslope or adverse terrain or because of shallow soils (less than six inches) or because of rockiness; and B) The substitute soils will meet the requirements of UMC 817.22(a) regarding substitute soils. The plan must provide evidence indicating that revegetation standards will be achieved with any substitute soil.

jr
cc: S. Linner
K. Wheeler
1342R/12:13

December 7, 1987

TO: Memo to File

FROM: Lynn Kunzler, Reclamation Biologist

RE: Proposed Ventilation Portal, SUFCO's Convulsion Canyon Mine, ACT/041/002-87B, Folder #2, Sevier County, Utah

The proposed plan for the ventilation portal at SUFCO's Convulsion Canyon Mine was reviewed and found to be adequate for biological resources information and planning. However, the following comments regarding reclamation of the site need to be addressed prior to approval:

UMC 784.13(b)(5)

(i) Timing - Please clarify when seeding will take place (i.e., late fall (October) preferred for optimal success). Also, how and when will cut and fill slopes be revegetated (or otherwise stabilized) for the operational phase of the pad?

(ii) The seeding rate for Blue flax (*Linum perenne*) should be increased to 1.0 lb/ac. PLS. The rates for Rubber rabbitbrush (*Chrysothamnus nauseosus*) and Vasey big sagebrush (*Artemisia tridentata* ssp. *vaseyana*) should be reduced to .5 lbs and .2 lbs PLS/acre respectively.

jr
cc: S. Linner
K. Wheeler
1343R/46

December 14, 1987

TO: File

FROM: Kent Wheeler, Reclamation Hydrologist

RE: Determination of Completeness; New Ventilation Portal, (submitted November 25, 1987) Convulsion Canyon Mine, Southern Utah Fuel Company, ACT/041/002, Sevier County, Utah

Summary:

The above-referenced plan was reviewed and found not to be complete. The operator does not address the runoff which would be produced during mining and reclamation. Furthermore, the plan does not address the possibility that this portal could become the discharge point for intercepted ground water after the mine has been closed down.

Determination of Completeness:

UMC 817.42 Hydrologic Balance; Water Quality Standards and Effluent Limitations - KW

This section has not been adequately addressed. Since the disturbed area at the breakout is small (1/4 acre), it qualifies for a small area exemption and does not need to be passed through a sedimentation pond. However, sediment control practices are still needed at the site. The Division feels that a berm around the outside of the pad area, of sufficient height to contain the expected runoff, and revegetating the outslopes of the pad would be sufficient sediment control during mining. During the reclamation phase, a variety of Best Management Practices (BMP's) will work. The BMP's that the operator will use should be clearly outlined in the submittal.

The use of a berm will require that it be shown on the site map. This site map should also contain a cross-section of the pad area (to determine slope), the berm (to show berm height), and the outslope (to determine slope).

jr
cc: D. Darby
W. Hedberg
S. Linner
R. Summers
1239R/82:83

December 16, 1987

To: File

From: David Darby, Geologist

RE: Determination of Completeness; New Ventilation Portal, Convulsion Canyon Mine, Southern Utah Fuel Company (SUFCo), ACT/041/002, Folder No. 2, Sevier County, Utah

Summary

SUFCo submitted a modification request on November 4, 1987 to develop a new portal area in Quitchupah Creek. It has been reviewed with respect to geologic and ground water concerns. In evaluating this proposal my major concern is weather this site will become a discharge point after the mine has been abandon.

The operator has committed to providing a permanent mine seal at the portal upon termination of mining. The proposed seal will be designed to withstand the hydraulic head that would develop if the entire mine is flooded.

Due to the location of this portal and the jointing system that exists in the area of the portal, the type of seal proposed by the operator may not be the most practical. Because the portal is lower in elevation than the other portals, it will receive the greatest hydraulic head that develops. Ground water blocked at the portal could route through joint fractures to the canyon walls resulting in uncontrolled mine discharge.

The type and size of discharge structure that will be needed for the portal seal can not be determined at this time, since ground water conditions are changing during mining and will not reach steady state conditions until after mine closure.

Due to these circumstances it would be more prudent for the operator to commit to emplacement of the portal seal using the best technology available at the end of mining.

The commitment should entail future development of designs for the portal seal to meet the parameters of ground water discharge volume and quality that may be produced at the cessation of mining.

Determination of Completeness:

UMC 817.50 Hydrologic Balance: Underground Mine Entry and Access Discharge-DWD

Since it is difficult to predict the hydrologic conditions that will exist at the portal site at the cessation of mining, the applicant should commit to seal the portal using the best technology available during the time of closure and treat ground water discharge that exceed the established limits in accordance with the regulations.

dwd

cc:
W. Hedberg
S. Linner
K. Wheeler
R. Summers
1299-42

January 5, 1988

TO: File

FROM: Randy Harden, Reclamation Engineer JRH.

RE: Proposed Portal Breakout, SUFCO, Quitchapah Canyon, ACT/041/002, Folder #2, Sevier County, Utah

Summary:

The proposed ventilation portal is acceptable with the stipulation provided hereunder.

Body:

Comments regarding the proposal by SUFCO to construct a new ventilation portal into Quitchapah Canyon are as follows:

With regard to bonding for the new facilities, the operator shall be required to modify the bond with a rider, incorporating the additional disturbed area into the bond. It is apparent that the addition of this portal to the operations is only a small percentage of the total bond amount. Since the operator is also in the process of including a waste rock facility into the plan, modification of the bond amount should be accomplished concurrently for both modifications. The operator shall commit to the following stipulation regarding bonding:

Stipulation UMC 800 - Bonding and Insurance - (1) - JRH

The operator shall incorporate into the mining and reclamation plan, cost estimates for both the waste rock disposal facility and the ventilation portal in Quitchapah Canyon upon approval by the Division for the waste rock disposal site. The operator shall provide a rider to the bond incorporating the new disturbed area, prior to disturbance caused by the ventilation portal.

Reference made to the MRP regarding the closure of the portal indicates that the stopping shall be placed a minimum of 25 feet from the portal opening and shall be backfilled on the out-by side of the stopping. This is considered to be acceptable by the Division. The operator has indicated that no water will be allowed to discharge from the mine opening upon cessation of mining operations and has incorporated a waterproof seal into the design. Upon cessation of mining operations and prior to reclamation of this, and other portals, the Division may require detailed designs for the construction of the seals in order to show sufficient factors of safety for the openings, in the event that they intend to impound water. This requirement would also be in accordance with the requirements of MSHA regulations.

jr
cc: W. Hedberg
S. Linner
K. Wheeler
1384R/15:16

United States
Department of
Agriculture

Forest
Service

Manti-LaSal
National Forest

599 West Price River Dr.
Price, Utah 84501

RECEIVED
JAN 08 1988
DIVISION OF
OIL, GAS & MINING

Reply to: 2820

Date: January 6, 1988

Lowell Braxton
State of Utah Natural Resources
Division of Oil, Gas and Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

Dear Lowell:

We have reviewed PAP Amendment, Request to Construct New Ventilation Portal, Quitchupah Canyon, Southern Utah Fuel Company, Convulsion Canyon Mine, ACT/041/002-87B, Folder #2, Sevier County, Utah.

The legal description discussed in SUFCO's November 24, 1987, submittal is incorrect. The location shown on the maps is actually the SE-1/4 of the SW-1/4 of Section 29, T21S, R5E, SLM, rather than the SW-1/4 of the SE-1/4. which is correct

The ventilation portal and pad lie on private surface owned by Coastal States Energy Company, however, if not properly constructed, the facility could affect Quitchupah Creek downstream on National Forest System lands. The facility appears to lie within the floodplain, therefore, it must be properly designed to protect it from erosion and flooding and to prevent pollution and changes in velocity to the drainage.

The maps and narrative are not adequate for evaluation. The narrative does not describe whether or not surface access to the pad will be necessary. Map 3 does not show sufficient detail to determine the elevations of the portal, pad, or edge of the fill slope relative to the elevation of the stream channel. More detail is needed and cross-sections should be provided.

Since construction of a fan is anticipated in the future, the pad should be adequately constructed to accommodate the future fan and any other needed support facilities such as a generator and fuel tanks, and prevent any potential spills.

If surface access across National Forest System land is needed, Forest Service permits will be required.

If you have any questions, please contact the Forest Supervisor's Office in Price.

Sincerely,

W. H. Boley

WILLIAM H. BOLEY
Acting Forest Supervisor

ACT/041/002-87B
File folder #3

United States Department of the Interior

BUREAU OF LAND MANAGEMENT

3482
~~SL-062583~~
(U-067)

Moab District
San Rafael Resource Area
900 North 700 East
Price, Utah 84501

JAN 04 1987

DIVISION OF
OIL, GAS & MINING

DEC 31 1987

Mr. D. Wayne Hedberg
Data Management Coordinator
Utah Division of Oil, Gas and Mining
355 West North Temple Street
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

Dear Mr. Hedberg:

We have received from you, on December 22, 1987, a copy of Southern Utah Fuel Company's PAP amendment to add a ventilation portal in Quitchupah Canyon at the SUFCo. No. 1 Mine, ACT/041/002-87B. The proposed breakout from the canyon to the 4th East main entries is located entirely on private surface land and out of our jurisdiction as to land management. The coal is also privately owned. However, this breakout could have some effect on future federal coal recovery. Should SUFCo. be successful in their efforts to lease additional federal coal to the north of the permit area, additional air will be needed to mine this coal. The 4th East ventilation portal would meet this need. We therefore agree with this resource recovery and protection plan amendment and recommend its approval. This is to confirm verbal approval given by Stephen Falk of my staff to you on December 28, 1987. If you need further information or have additional questions, please contact either Stephen or me.

Sincerely yours,

James W. Dryden
Area Manager

cc: SD, Utah (U-921)
DM, Moab (U-065)
Southern Utah Fuel Co.

UNITED STATES DEPARTMENT OF AGRICULTURE
FOREST SERVICE
FISHLAKE N. F.
115 EAST 900 NORTH
RICHFIELD, UTAH 84701

RECEIVED
DEC 23 1987
DIVISION OF
OIL, GAS & MINING

Reply To: 2820-4

Date: December 21, 1987

Mr. D. Wayne Hedberg
State of Utah, Division of Oil, Gas and Mining
355 W. North Temple
3 Triad Center, Suite 350
Salt Lake City, UT 84180-1203

Dear Mr. Hedberg:

Re: PAP Amendment, Request to Construct New Ventilation Portal, Quitchupah Canyon, Southern Utah Fuel Company, Convulsion Canyon Mine, ACT/041/002-87b, Folder #2, Sevier County, Utah

Thank you for your December 3, 1987 letter and the information concerning the above captioned proposal.

The proposed portal is located on fee land within the boundary of the Manti-LaSal National Forest. It will be only remotely visible from a limited area of the Fishlake and, we see no problems associated with having it constructed. We see no problems with the possibility of future fan installation either.

Thanks again, we appreciate the opportunity to comment.

Sincerely,

for J. KENT TAYLOR
Forest Supervisor

cc:
District Ranger, Richfield Ranger District

ACT/041/002-B7B

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
RICHFIELD DISTRICT OFFICE
150 EAST 900 NORTH
RICHFIELD, UTAH 84701

IN REPLY REFER TO:

3400
(U-052)

RECEIVED
DEC 23 1987
DIVISION OF
OIL, GAS & MINING

December 21, 1987

Mr. D. Wayne Hedberg
State of Utah Natural Resources
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

Dear Mr. Hedberg:

We are in receipt of your letter concerning Southern Utah Fuel Company's plan amendment to construct a new ventilation portal in T. 21 S., R. 5 E., SW1/4SE1/4 of Section 29. Since the land is in private ownership, the BLM has no jurisdiction over the amendment. However, we have reviewed the plan amendment and find no problems with the plan as presented.

Sincerely,

Donald L. Pendleton

Donald L. Pendleton
District Manager

Norman H. Bangerter
Governor

Suzanne Dandoy, M.D., M.P.H.
Executive Director

Dec. 23, 1987

RECEIVED
DEC 28 1987
DIVISION OF
OIL, GAS & MINING

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

RE: Southern Utah Fuel Company,
New Ventilation Portal

Dear Mr. Hedberg;

On behalf of the Division of Environmental Health, I have reviewed Southern Utah Fuel Company's request to construct a new ventilation portal in Quitchupah Canyon, Convulsion Canyon Mine, for environmental health concerns.

The proposal, as I understand it, involves the construction of a new mine portal to be used for ventilation and emergency escape. When the portal is opened, a pad will be constructed for future installation of a ventilation fan. The disturbed area will involve approximately 0.10 to 0.25 acres. No water is to be discharged from this portal.

Because of the limited area affected, surface runoff and erosion potential should not increase significantly. However, because the proposed portal is located adjacent to Quitchupah Creek, special consideration should be given to the possibility of increased surface runoff and erosion in the area draining to the creek. They will need to be aware of any change in the quality of water in the creek because of restrictions already in place. For this reason, we would ask that SUFCO be required to notify us when construction is underway, so that we may follow-up on this concern.

Otherwise, there seems to be nothing else proposed which should have an effect on surface water, drinking water or ground water; nothing which will produce any type of wastewater; no solid or hazardous wastes produced; and no apparent effect on air quality.

Kenneth L. Alkema, Director • Division of Environmental Health

Central Utah District • 201 East 500 North • Richfield, Utah 84701 • (801) 896-5451

We appreciate receiving this plan for review of environmental health concerns. If we can be of further help with this particular proposal, please call at 896-5451.

Sincerely,

Roger A. Foisy

Roger A. Foisy, P.E.
District Engineer

cc: Walt Baker, Bureau of Water Pollution Control
Bob Lowe, R.S., Central Utah District Health Dept.
Dale Parker, Division of Environmental Health