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State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

Norman H. Bangerter

Governor

Dee C. Hansen

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Dianne R. Nielson, Ph.D.

Division Director

355 West North Temple

3 Triad Center, Suite 350

Salt Lake City, Utah 84180-1203

801-538-5340

May 24, 1989

Mr. Wess Sorensen
Southern Utah Fuel Company
P. O. Box P
Salina, Utah 84654

Dear Mr. Sorensen:

Re: Conditional Approval, Amendment, New Subsoil Storage Area,
Southern Utah Fuel Co., Convulsion Canyon Mine, ACT/041/002-89A,
Folder #2, Sevier County, Utah

The Division has completed review of your company's submittal received May 3, 1989. The plans were reviewed by Mike DeWeese and James Leatherwood of the Division's technical staff. Resolution of the conditions as outlined in the attached technical review memos by June 19, 1989 will consummate final approval.

Please submit fourteen (14) copies of the final maps and plans, formatted for direct insertion into the Convulsion Canyon Mining and Reclamation Plan.

If you have any questions, please call Mike DeWeese or me.

Sincerely,

A handwritten signature in cursive script that reads "Susan C. Linner".

Susan C. Linner
Reclamation Biologist/
Permit Supervisor

cl
cc: J. Helfrich
M. DeWeese
BT45/238



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May 8, 1989

TO: Susan C. Linner, Permit Supervisor
FROM: James S. Leatherwood, Reclamation Soils Specialist
RE: Subsoil Storage, Southern Utah Fuel Company, Convulsion Canyon Mine, ACT/041/002, Sevier County, Utah

SUMMARY

The Convulsion Canyon Mine Subsoil Storage Plan, Received April 27, 1989, has been reviewed. The following outline concerns that must be addressed.

DISCUSSION

UMC 817.21 Soil: General Requirements - JSL

The following items were not defined within the proposed plan:

- (1) Volume of subsoil salvaged;
- (2) Final use of the subsoil material;
- (3) Acreage of stockpile;
- (4) Topsoil removal, stockpile and redistribution plans for the subsoil stockpile area; and,
- (5) Methodology of placement including appropriate stabilization procedures. Identify specific proposed contemporaneous seed mix to be used on the subsoil stockpile.

RECOMMENDATIONS

The concerns previously stated must be adequately addressed prior to final unconditional approval.

c1
cc: M. DeWeese
BT51/61



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May 15, 1989

TO: Susan Linner, Permit Supervisor

FROM: Mike DeWeese, Reclamation Hydrologist *MD*

RE: New Subsoil Storage Area, Southern Utah Fuel Company,
Convulsion Canyon Mine, ACT/041/002-89A, Sevier County, Utah

SUMMARY:

The operator's submittal received April 22, 1989, proposing to create a subsoil storage area at the Waste Rock Disposal Site, has been reviewed regarding hydrologic concerns. The submittal is not considered technically adequate. Deficiencies are discussed in the following analysis.

ANALYSIS:

Information regarding the topsoil stockpile constructed in conjunction with the subsoil stockpile was not included in this submittal. All information required for the subsoil stockpile is also applicable to the topsoil stockpile and must be submitted to the Division.

Map 2 of the submittal depicts a subsoil stockpile area of 0.55 acres adjacent to the southwest perimeter of the waste rock disposal site. The total disturbed area in the approved permit is 17 acres, of which 0.3 acres are identified as small area exemptions. The addition of the subsoil storage area will bring the total small area exemptions to 0.85 acres, equivalent to 5.0% of the total disturbed area. The addition of the new topsoil stockpile acreage will not significantly increase the percentage of small area exemptions. Therefore the total acreage of small area exemptions will remain in the acceptable range.

The proposed subsoil stockpile site cannot be placed within the existing sediment pond drainage area as this area is required for waste material. The operator's cover letter states that alternate sediment control measures such as silt fences, straw bales, or other sediment control devices will be employed to treat surface runoff from the stockpile. The operator has verbally

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New Subsoil Storage Area
Southern Utah Fuel Company
Convulsion Canyon Mine
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informed the Division (personal comm., Mike Davis, May 22, 1989) that the stockpile is currently in place and sediment control measures are installed. A silt fence approximately 20 feet long has been placed along the lowest portion of the stockpile perimeter and the remainder of the perimeter bermed. Map 2 must be revised to depict, with labels, the following:

1. the location and extent of the sediment control measures implemented on the subsoil and associated topsoil stockpile;
2. the existing sediment fences below the waste rock topsoil stockpiles;
3. the new topsoil and subsoil stockpiles identified as small area exemptions;

Volume 8 page 31 of the MRP states that the only topsoil storage area is at the mine site sedimentation pond. This section of the text must be corrected to include the waste rock disposal site topsoil stockpiles. In addition, any other references in the text to small area exemptions must be appropriately revised to include the subsoil storage area.

RECOMMENDATIONS:

The Division recommends that the proposed amendment classifying the subsoil storage area as a small area exemption be granted final approval upon receiving the aforementioned revised items.

BT98/30-31