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State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203
801-538-5340

July 13, 1989

Mr. Ken Payne
Southern Utah Fuel Company
Convulsion Canyon Mine
P. O. Box P
Salina, Utah 84654

Dear Mr. Payne:

Re: Initial Completeness Review, Quitchupah Lease Tract
Addition, Southern Utah Fuel Company, Convulsion Canyon
Mine, ACT/041/002, Folder #2, Sevier County, Utah

Enclosed is an Initial Completeness Review (ICR) attendant to the Permit Application Package (PAP) for the Quitchupah Lease Tract Addition. In order to expedite the completeness process, I recommend that a meeting be arranged for 2:00 p.m. on July 19, 1989, at the Division office to discuss and clarify any questions concerning the ICR.

If you or your staff have any questions prior to next Wednesday, please feel free to call me.

Sincerely,

Richard V. Smith

Richard V. Smith
Permit Supervisor

djh
Enclosure
AT8/68

**INITIAL COMPLETENESS REVIEW
QUITCHUPAH LEASE TRACT ADDITION
CONVULSION CANYON MINE
ACT/041/002**

**Southern Utah Fuel Company
Sevier County, Utah
July 13, 1989**

UMC 771.23 Permit Application - General Requirements for Format and Contents-(PGL)

(e) The applicant must revise Maps 1.1 and 1.2 to clearly indicate the Quitchupah Lease Tract permit boundary. At present Maps 1.1 and 1.2 only delineate the "SUFCO Property Boundary."

UMC 771.25 Permit Fees-(RVS)

The applicant must submit the required fee of \$5.00.

UMC 771.27 Verification of Application-(RVS)

The applicant must submit a notarized verification by a responsible official that information contained in the Permit Application Package (PAP) is true and correct to the best of the official's information and belief.

UMC 782.13 Identification of Interests-(RVS)

(b)(3) The applicant must submit the names under which the parent company and its affiliates have operated coal mining activities in the United States during the past five years (eg. ANR Coal Company, Apache Coal Company, Brooks Run Coal Company, etc.).

(d) The applicant must submit the permit numbers and identify the regulatory authority for each coal mining operation given under UMC 782.13(b)(3).

UMC 782.14 Compliance Information-(RVS)

(a) The applicant must submit a statement pertaining to permit suspensions/revocations and bond forfeitures for those permits listed under UMC 782.13(d).

(b) If any suspension, revocation or forfeitures has occurred the applicant must submit a statement of fact as described under this paragraph.

Initial Completeness Review
Quitcupah Lease Tract Addition
Convulsion Canyon Mine
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(c) Please be aware that Exhibit II need not contain violation information pertaining to Utah Fuel Company.

UMC 782.16 Relationship to Areas Designated Unsuitable for Mining-(RVS)

(a) The applicant must submit a statement about whether the proposed permit area is within an area designated unsuitable for the surface effects of underground coal mining activities.

UMC 782.21 Newspaper Advertisements and Proof of Publications-(RVS)

The copy of the newspaper advertisement must be edited to refelect that the submittal for the Quitcupah Lease Tract constitutes a new permit {see UMC 782.12(b)}. For example, the first paragraph of the advertisement should read as follows:

" , has filed with the Division of Oil, Gas and Mining a Permit Application Package (PAP) for conducting underground mining on the Quitcupah Lease Tract. The Division of Oil, Gas and Mining has determined the PAP to be complete."

See Attachment A for additional editorial suggestions.

Please be aware that after four weeks of consecutive publication, the applicant must submit a notarized proof of publication to the Division.

UMC 783.12 General Environmental Resources-(RVS)

(b) The applicant must submit a survey of cultural and historical resources within the proposed permit area.

UMC 783.14 Geology Description-(RVS)

(a)(2) The applicant must submit information as follows:

- (i) The location of subsurface water, if accounted by drilling;
- (ii) The pyritic content and potential alkalinity of strata immediately above and below the coal seam to be mined; and

(iv) The pyrite and sulfur content of the coal seam to be mined.

*** Please note that the above data should be acquired from the borehole drilling program to allow site-specific findings. Also, Figure 5.1 was not found in the Quitichupah Lease Tract submittal (Figure 5.1 referenced on page 19, Volume 10).

UMC 783.15 Ground Water Information-(TM)

The following information is lacking in the application package and will be required prior to permit approval.

(a) The applicant shall contain a description of the groundwater hydrology for the proposed lease addition and adjacent area, including, at a minimum:

- (1) The depth below the surface and the horizontal extent of the water table and aquifers;
- (2) The lithology and thickness of the aquifers;
- (3) The uses of the water in the aquifers and water table; and
- (4) The quality of subsurface water, if encountered.

(b) The application will contain additional information which describes the recharge, storage, and discharge characteristics of aquifers and the quality and quantity of ground water, according to the parameters and in the detail required by the Division.

Three proposed monitoring wells will provide a portion of the technical information required above. They are shown on Map 6.1 as wells 89-18-1, 89-20-2, and 89-16-7.

The following additional information will need to be provided prior to permit approval.

- A. Identification of groundwater recharge areas;
- B. Description of aquifers by formation;
- C. Delineation of structural hydrologic features for the proposed permit area (eg. faults);

- D. Description of inflow quality and quantity from the Convulsion Canyon Mine; and
- E. Mine discharge projections for proposed permit area based on current discharges. References to the existing permit or updates to this information will be considered adequate.

The applicant should be able to provide water quality information for aquifers above the coal seam (i.e. roof bolt holes fracture zones, sandstone channels). The applicant must also provide water quality information on the aquifers below the coal seam. This could be potentially accomplished by drilling in-mine monitoring wells in areas where they will not be disturbed by mining activities.

The applicant must provide a synthesized description of monitoring data submitted in their annual report. An attempt must be made to describe or graphically update and explain occurrences of water; both in-mine and out of the mine. Water quality can be correlated to formation based on various constituents and would help explain the existing environment. Plotting of discharge of springs over time would help define the discharge recession characteristics of springs and hopefully prevent any confusion over potential subsidence impacts.

The applicant must provide a detailed in-mine monitoring program and provide commitments to monitor significant in-mine flows. All monitoring points must be shown on a mine map and updated annually.

UMC 783.16 Surface Water Information-(TM)

The applicant must describe and update existing data collected at sampling points 006 and 007 and provide a summary of one year's baseline data on all new sources of water (6W-13, 6W-21, 090, and 089) prior to permit approval.

This summary will include at a minimum:

- (1) Minimum, maximum and average discharge conditions, which identify critical low flows and peak discharge rates of streams sufficient to identify seasonal variations; and
- (2) Baseline water quality and quantity information sufficient to identify seasonal variation. This will include at a minimum of three data points spaced at least a month apart for the first year (i.e. July, August, and September).

This information must be appropriately integrated into the existing plans (i.e. Volume 4, PAP).

UMC 783.19 Vegetation Information-(BAS)

(b) The operator must provide a vegetation map of the Quitcupah Lease Tract area.

UMC 783.25 Cross Sections, Maps, and Plans-(TM)

(f) After completion of the monitoring wells, the applicant must provide the location and extent of subsurface water, if encountered, within the proposed permit area or adjacent areas including, but not limited to areal and vertical distribution of aquifers, and portrayal of seasonal differences of head in different aquifers on cross-sections and contour maps.

UMC 784.13 Reclamation Plan General Requirements-(TM)

(b)(8) The applicant must be aware that their monitoring wells must meet the criteria for drilling and plugging monitoring wells as described in the State of Utah's Administrative Rules for Water Well Drillers. Approval to drill monitoring wells must be received from the Division of Water Rights in Price, Utah.

The applicant must also provide a detailed description of how their monitoring wells will be installed prior to installation and a commitment to attempt to collect water quality information if it is feasible during drilling. At least one monitoring well should be installed with a pump to monitor any aquifer, if encountered.

Due to the fact that the applicant has lost monitoring wells in the past, it is required that a commitment to maintain at least three monitoring wells for the lease area be incorporated into the plan.

UMC 784.14 Reclamation Plan Protection of Hydrologic Balance-(TM)

(b)(3) The applicant must to provide a plan, including sampling frequency and a list of parameters, for in-mine sampling for significant mine inflows.

The applicant does not include all the baseline parameters required by the Division's Water Monitoring Guidelines in the water monitoring plan. The applicant must explain why certain parameters have been excluded from the plan (i.e. dissolved oxygen for perennial streams, sulfide, etc.).

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(c) The applicant shall provide a determination of the probable hydrologic consequences of the proposed underground coal mining activities, on the proposed permit area and adjacent area, with respect to the hydrologic regime and the quantity and quality of water in surface and ground water systems under all seasonal conditions, including the contents of dissolved and total suspended solids, total iron, pH, total manganese, and such other parameters as may be required by the Division on a case-by-case basis.

The probable hydrologic consequences must include an assessment of potential mining-induced impacts to the quality and quantity of ground water based on the information obtained from the proposed monitoring wells and an assessment of the current in-mine monitoring program.

UMC 784.21 Fish and Wildlife Plan-(BAS)

(a)(b) The applicant's proposal for limited extraction beyond escarpments and under creek beds is not entirely adequate. A commitment must be made to: (1) contract with the Utah Division of Wildlife Resources to inventory raptor nests along escarpments, prior to undermining, (2) procure the necessary permits for nests threatened by subsidence, and (3) perform follow-up studies of nesting raptors, in the event cliff spalling occurs.

BT240/1-6

ATTACHMENT

EXHIBIT VI PROPOSED NEWSPAPER ADVERTISEMENT FOR PERMIT MODIFICATION

Coastal States Energy Company, 175 East 400 South, Suite 800, Salt Lake City, Utah, a wholly owned subsidiary of the Coastal Corporation, has filed with the Division of Oil, Gas and Mining an application for permit modification for its Southern Utah Fuel Company (SUFCo) underground coal mine. The Division of Oil, Gas and Mining has determined the Mine Plan submitted for the permit modification to be apparently complete.

Quitchupak Lease Tract
The SUFCo mine is located 30 miles from Salina, Utah. The ^{permit} area included in the ~~permit modification application~~ is described as follows: *includes Federal Coal Lease U-63214 and*

T. 21 S., R. 4 E, SLM, Utah
Sec. 12, E1/2 SE1/4; Sec. 13, E1/2 NE1/4, S1/2; Sec. 14, E1/2 SW1/4, SE1/4; Sec. 23, E1/2, E1/2 W1/2; Sec. 24, all.

T. 21 S., R. 5 E, SLM, Utah
Sec. 15, W1/2; Secs. 16-21, all; Sec. 22, W1/2; Sec. 26, W1/2 NW1/4 SW1/4, SW1/4 SW1/4; Sec. 27, all; Sec. 28, N1/2, N1/2 SW1/4, SE1/4 SW1/4, SE1/4; Sec. 29, E1/2 NE1/4, NE1/4 SE1/4; Sec. 30, Lot 1, N1/2 NE1/4; Sec. 33, Lots 2-4, NE1/4, E1/2 NW1/4, NE1/4 SW1/4, N1/2 SE1/4; Sec. 34, all; Sec. 35, lots 1, 2, W1/2 NW1/4, N1/2 SW1/4.

T. 22 S., R. 5 E., SLM Utah
Sec. 3, lots 1-4, S1/2 N1/2, NE1/4 SW1/4, S1/2 SW1/4, N1/2 SE1/4, SW1/4 SE1/4; Sec. 4, lots 1, 2, S1/2 NE1/4, SE1/4 SE1/4; Sec. 9, NE1/4 NE1/4; Sec. 10, W1/2 NE1/4, NW1/4, N1/2 SW1/4.

Containing 9,905.46 Acres

Coal will be accessed through the existing

^{has}
^ The SUFCo mine ~~has been in operation~~ since 1941 ^{and operated} ~~operating~~ under permit ACT-041-002 since August 26, 1987. ^{active}

~~The modification application~~ ^{PAP} ~~was filed~~ ^{which} and this notice is being published to comply with the Surface Mining Control and Reclamation Act of 1977 and State and Federal regulations promulgated to said Act.

A copy of the ~~modification application~~ ^{PAP} is available for public inspection at the Sevier County Courthouse, 250 North Main Street, Richfield, Utah, and at the Division of Oil, Gas and Mining offices located at 335 West North Temple, 3 Triad Center, Suite 350, Salt Lake City, Utah.

Written comments or requests for informal conferences on the application may be submitted to: The State of Utah Department of Natural Resources, Division of Oil, Gas and Mining, 355 West North Temple, 3 Triad Center, Suite 350, Salt Lake City, UT 84180-1203

Coastal States Energy Company would appreciate copies of any comments submitted to the Division of Oil, Gas and Mining.