



State of Utah

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August 23, 1989

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

Dear Mr. Payne:

Re: Mid-Permit Term Review, Convulsion Canyon Mine, ACT/041/002,
Folder #2, Sevier County, Utah

The Convulsion Canyon Mine was granted a five-year permanent program mining permit on May 19, 1987. In accord with UMC 788.11, a Mid-Permit Term Review (MPTR) is now due. Attached is a flow chart outlining the steps and time frames for the MPTR process.

The Division has reviewed the permit, with conditions, and the current Mining and Reclamation Plan (MRP) on file and determined that the MPTR will include the following: a requirement to submit a reorganized MRP, including revised text and/or maps to bring the MRP into conformance with site conditions or current Division policy; and an on-site technical inspection.

The MRP requires reorganization and reformatting. In many areas the original plans have been amended, some several times, but the old text and maps have not been removed. There are references to construction plans which were not approved and existing facilities are referred to in the text as proposed.

Southern Utah Fuel Company (SUFCO) will need to revise all chapters of the MRP to be current and concise, reflecting the plan as currently approved, as well as on-the-ground conditions. It is suggested that technical studies and consultants' reports be placed in an Appendix Volume, and that they be referenced in the text of the MRP. All plans and designs should be incorporated into the text as appropriate. All pages and maps should be uniquely numbered and dated. It is further suggested that the new MRP be organized along the format of the new rules to avoid having to do major restructuring again.

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It is recognized that reorganization of the MRP is a major task which will take more time than that allotted for a MPTR. The Division will require that a complete and updated MRP be in place by the date of application for permit renewal; that is by January 19, 1992. As part of the MPTR, the Division will require a written commitment and schedule to achieve this requirement.

A cursory review of the existing MRP has uncovered some deficiencies which are described in the attachment to this letter. These should be addressed in the new MRP. A complete analysis of the plan for compliance with current rules and policies will not be feasible until the MRP has been reorganized and resubmitted. Therefore initial submittal of a complete MRP prior to January 19, 1992 is recommended.

A commitment and schedule for completion of the reorganized MRP should be submitted by September 30, 1989. The Division would like to conduct the technical site inspection in late September, as your schedule will allow. Please contact me to make arrangements.

At the time of the inspection we can discuss any questions you have regarding the reorganization of the MRP or site conditions. Please contact me if I can provide further information.

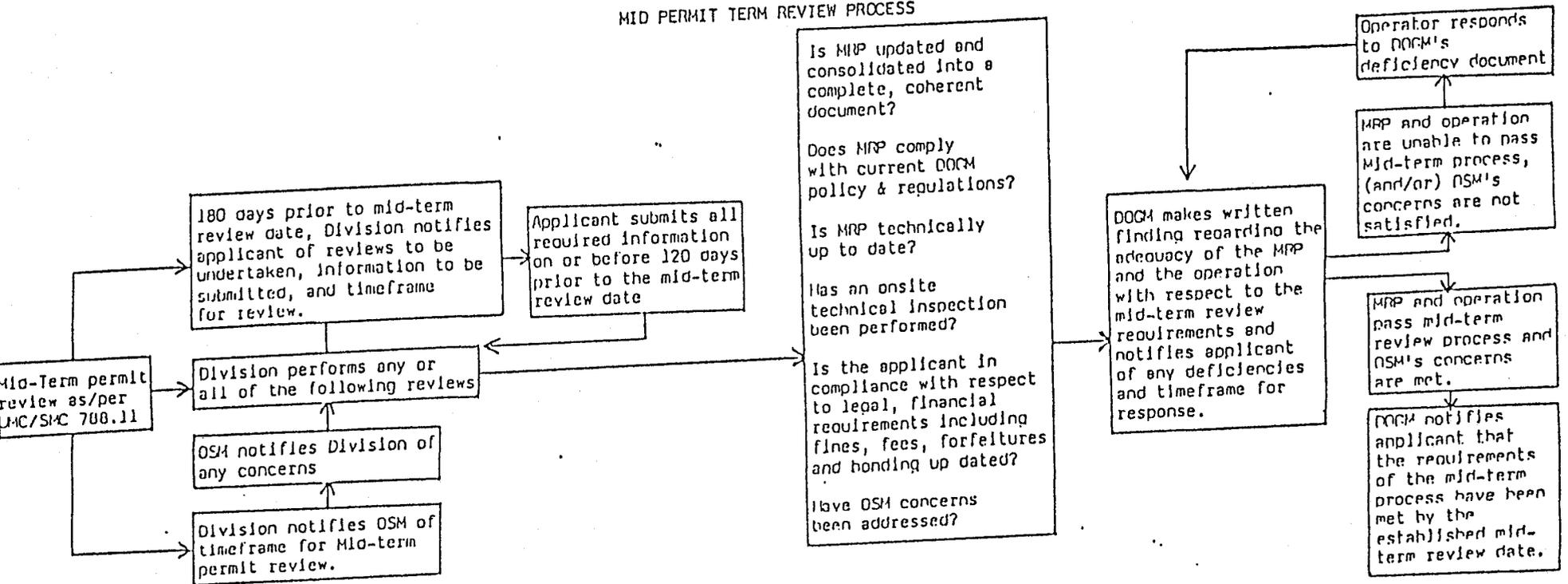
Sincerely,



Susan C. Linner
Reclamation Biologist/
Permit Supervisor

cl
Attachments
cc: R. Hagen
P. Rutledge
B Team
BT45/296-297

MID PERMIT TERM REVIEW PROCESS



MID PERMIT TERM REVIEW
Southern Utah Fuel Company
Convulsion Canyon Mine
ACT/041/002

August 23, 1989

UMC 771.23 Permit Applications - General Requirements For Format And Contents - MMD

Information presented in the MRP is organized chronologically by correspondence documents dating back to the original MRP submitted in 1979. As reviews were conducted and various submittals included in the MRP over the years, the original submitted information was not updated and deleted when necessary. As a result, the plan contains conflicting and often inaccurate descriptions of the current mine facilities. Therefore the operator must initiate a reorganization process to update the MRP and present the required information in a clear and concise manner. The text should be organized by major topics such as engineering, hydrology, soils, vegetation, etc. with supporting calculations and data presented in attending appendices. Outdated plans should be deleted from the text (e.g. references to "proposed" designs which have been constructed) as should old Division review documents. The reorganized MRP should be consolidated to present only designs and descriptions of the current facilities implemented at the Convulsion Canyon Mine. Information such as consultants reports and past review documents may be included in appendix form if the operator so wishes.

UMC 783.14 Geology Description - JSL

The MRP must include a plan to monitor the roof, floor and mid-seam according to table 6 of the Utah Division of Oil, Gas & Mining's "Guidelines for the Management of Topsoil and Overburden for Surface and Underground Coal Mines" for possible acid- or toxic-forming materials. Monitoring shall be conducted on an annual basis or more if the general location of the mining operations change and this change results in a change in the quality of the roof, floor or mid-seam.

UMC 783.15 Ground Water Information - DWD

The applicant should use existing data to derive a table or graph illustrating the amount of ground water discharge from the mine over time. The operator has mentioned that mine discharge volumes were over rated prior to emplacement of a weir at the outlet of the underground sump. The applicant should develop a correlation between the mine discharge data sets collected before and after weir installation.

Well data should be updated and illustrated on graphs. The functional status of each well should be updated. A table should be developed to include all functioning wells. The table should indicate total depth drilled, total depth cased (feet), total depth measured (feet), the top of casing (elevation), top of the coal seam (elevation), depth to the coal seam (feet), depth and length of perforation.

UMC 783.21 Soil Resources Information - JSL

Concerns relative to the soil survey are editorial in nature and pertain to Volume 2. Page 38 should reference the appropriate soil survey maps and should reflect current soil survey descriptions in Volume Five.

UMC 783.24 Maps: General Requirements - JSL

UMC 783.25 Cross-Sections, Maps, and Plans - JSL

The septic tank and leach field shown on plate H-II, Geologic description map, is considered an operation incident to underground mining activities and must therefore be placed within the permit area and delineated as such on all appropriate maps.

Each appropriate map incident to the MRP must be certified by a qualified registered professional engineer.

Other editorial concerns are:

- 1) Volume 1, Cross-section D-D', Volume 2, exhibit 11 & 12, among others, are outdated.
- 2) Plate H-II, Geologic description, does not delineate flood irrigated areas as referenced to under Volume 4, page 70.
- 3) Maps 83-3 and 83-4 in addition to Design Plan 1 of Exhibit 1 were not found.
- 4) Final reclamation contour map must be updated to include contour intervals at an extent that clearly delineates post-mining topography.

UMC 784.13 Reclamation Plan: General Requirements - JSL

The statement that fill areas are enhancing the area (Volume 2, page 41, section 5) must be removed from the MRP unless otherwise supported by complete and accurate justification.

Volume 3, completeness response, page 201 and 203 discuss reclamation and monitoring of the gob slide area adjacent to the access road. Monitoring analysis and summary of success must be included within the text of the MRP.

Dr. Al Southard's Reclamation Plan proposes to use irrigation as one of the reclamation techniques for the disturbed area. The plan does not however, either commit or not commit, with appropriate explanation why, to irrigation. This discrepancy must be resolved within the text of the MRP.

The MRP must identify the volume and location of the soil material to be used for the filling of the buried tank at the time of final reclamation.

UMC 784.14 Reclamation Plan: Protection of Hydrologic Balance - DH

The water monitoring plan is out of date and should be revised. Sites 060, 061, and 062-1 are in retreated cave-in areas that are no longer accessible. These sites should be dropped from the plan and possibly other new in-mine sites identified and incorporated into the plan.

UMC 784.20 Subsidence Control Plan - DH

The plan is not specific in regard to subsidence monitoring methodologies, frequency of monitoring, or monitoring stations. Aerial surveys have been used but this is not specified in the MRP.

The 1986 TA, page 36, states, "Subsidence is monitored at six month intervals by mine personnel with survey points located where settling is anticipated. A semi-annual report is currently and shall in the future be provided to State and Federal authorities, which tabulates horizontal and vertical displacements at each of the monitoring stations." It also indicates that an annual Raptor Survey is required starting in spring of 1987.

A clear and concise subsidence monitoring plan, which incorporates all of the operator's commitments, needs to be placed into the MRP.

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UMC 784.20 Subsidence - DWD

The applicant should submit updated mining sequence maps which will also include areas for mining throughout the five year permit term.

UMC 817.21 Topsoil: General Requirements - JSL

Earlier submittals do not reflect the approved substitute topsoil changes reflected in the later submittals. Volume 8, 1983 stipulation response defines the approved substitute topsoil plans. The following list areas that must be updated: Volume 1, page 19 and Volume 2, page 19 & 28; Volume 5, 1981 submittal; and, Volume 8, 1983 Completeness Review, page 30.

Volume 8, 1983, stipulation response, reflects the accepted 6" redistribution depth. Volume 2, pages 41 and 53 must be updated to reflect the accepted redistribution depth of 6". The plan should also contain a soil redistribution map indicating those areas proposed not to receive substitute topsoil.

UMC 817.42 Hydrologic Balance - DH

Areas of disturbance which do not drain to a sediment pond or which do not have Small Area Exemption status, have been identified during field inspections. These are Quitchupah and other breakout portals, slope just east and above the main mine fan, pumphouse, leachfield, and spring collection system. In addition, the pumphouse, leachfield, and spring collection system are outside the permit area. A determination should be made whether or not these areas should be included in the permit area and if so they need SAE status.

All of these areas should be addressed in the plan.

UMC 817.46 Hydrologic Balance: Sedimentation Ponds - MMD

UMC 817.49 Hydrologic Balance: Permanent and Temporary Impoundments - MMD

UMC 817.46 (r) requires that sedimentation ponds shall be certified after construction by a registered professional engineer. Drawing 83-5 depicts the as-built volume configuration of the sedimentation pond but is not certified. The operator must revise this drawing to include the certification stamp of a registered P.E.

A certification report pursuant to UMC 817.49 (h) could not be located in the MRP. The operator must submit a certification statement for direct insertion into the MRP addressing the items enumerated by this regulation.

UMC 817.52 Hydrologic Balance: Surface and Groundwater Monitoring -
MMD

Although several monitoring reports and corresponding data submittals were found, details of the current monitoring program were not located in the MRP. The operator must submit a detailed description of the present water quality monitoring program implemented at the mine including sampling frequency, parameters analyzed, and methodology.

UMC 817.89 Disposal of Noncoal Waste - DH

There is no discussion of an ultimate disposal area for noncoal waste. A trash pit is delineated on Map 83-3 but is not shown on Map 83-2. Waste oil storage is not discussed.

The plan must include a discussion of noncoal waste disposal on both a temporary and permanent basis. Maps should also depict disposal areas.

UMC 817.89 Disposal of Noncoal Waste - JSL

The MRP must be updated to reflect the required two foot soil depth minimum over the noncoal waste. Specifically, Volume 1, page 14; Volume 1, Addendum No. 3, first page; Volume 2, page 52; Volume 8, 1983, completeness response; and, Volume 8, 1984 stipulation response.

The plan discusses the possibility of incineration of all combustible noncoal waste. The plan for incineration should be elaborated upon or deleted from the text.

UMC 817.95 Air Resource Protection - JSL

Volume 2, page 51 of the MRP discusses efforts pertaining to coal particulate monitoring. The results of said monitoring along with a summary of the results of the particulate monitoring to date must be submitted within the MRP.