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Southern Utah Fuel Company

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April 23, 1990

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DIVISION OF
OIL, GAS & MINING

Darron Haddock,
Permitting Supervisor
Division of Oil, Gas and Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

Dear Mr. Haddock:

The time that you and your staff spent on April 17, 1990 discussing the permit rewrite with Ken May, Keith Welch and Wess Sorensen at your Salt Lake City office is appreciated. From the meeting, it is our understanding that the proposed outline following the "New Regulations" (see OSM approval Federal Register April 12, 1990) is to be used in the rewrite of the SUFCo MRP.

In writing the plan it is recognized that various sections overlap. In those cases, the requirements will be addressed in the most appropriate section of the plan and referenced in the other sections. Plan sections will be numbered to correspond with the "New Regulation" section numbers for easy reference. It was also agreed that a statement covering surface coal mining would be incorporated into the Introduction as an exclusion rather than repeat the exclusion language in each regulation that deals with surface mining only.

To keep the MRP from becoming unweildy, it was agreed that consultant reports will be compiled into an Appendix Volume for detailed reference. Specific commitments will be made within the permit document with excerpts of the consultant reports quoted as needed with reference made to the Appendix Volume.

It was pointed out by the Division that certification requirements are more rigorous under the "New Regulations". Prior to submittal, SUFCo will review certification with the Division to ensure compliance is obtained.

The Hydrology Section will need to be revised to provide the objective of the monitoring plan. The "New Regulations" emphasize how data will be used, not just what will be collected. Hydrology calculations for 10 year-6 hour events will also need to be made. It is anticipated that the 10 year-6 hour flows will be less than the 10 year-24 hour flows, so no additional design work on drainage structures will be needed. The Probable Hydrological Consequence (PHC) will need to be beefed up.

D. Haddock
4-23-90
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It is believed that adequate data exists for the Wildlife, Vegetation and Soils sections within the current MRP. This information will need to be put into the proper format.

The possibility of keeping the Waste Rock Disposal Site as a separate volume with references to it in the various sections was agreed to by SUFCo and the Division, if appropriate.

The Division will supply a copy of the "New Regulations" to SUFCo in a WP-Plus format for the Wang computer system. Randy Harden will contact Annette Kennett and Bill Tidwell to arrange the transfer to Coastal's Wang.

SUFCo will evaluate submitting the MRP text on disk in a WP-Plus format in addition to the printed copies.

The Division (Dave Darby), will compile a list of maps they would like to have in the MRP and give the list to SUFCo. SUFCo will consider submitting the permit maps in AUTOCAD format, if available, in addition to the maps included in the MRP.

This meeting was beneficial in establishing a starting point for the revision of the SUFCo MRP. It is hoped that similar meetings can be held throughout the rewrite process. Effective two-way communication between the Division and SUFCo will help the rewrite and review processes to proceed smoothly.

Sincerely,
SOUTHERN UTAH FUEL COMPANY



Wesley K. Sorensen, P. E.
Chief Engineer

WKS:jad/#27

xc: Lowell Braxton, DOGM
Kerry Frame, SUFCo
Ken May, Coastal
Keith Welch, Coastal