



State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

Norman H. Bangertter
Governor

Dee C. Hansen
Executive Director

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

January 30, 1991

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

Dear Mr. Payne:

Re: Deficiency, Substation Amendment, Southern Utah Fuel Company,
Convulsion Canyon Mine, ACT/041/002-90(F), Folder #2, Sevier
County, Utah

The Division has completed review of your company's substation amendment received November 9, 1990. The plans were reviewed by Randy Harden and Sharon Falvey of the Division's technical staff. The submitted plans cannot be considered adequate for approval at this time. Several deficiencies have been identified which must be resolved before the amendment can be approved. Specific plans for drainage control and reclamation are missing from the plan.

Please resolve the deficiencies as outlined in the attached memos by March 1, 1991. Failure to do so will result in denial of this amendment. In correcting the deficiencies please be aware that you should submit thirteen (13) additional copies of the complete amendment for distribution to other agencies..

If you have any questions, please call Randy Harden or me.

Sincerely,

Daron R. Haddock
Permit Supervisor

Attachments
cc: R. Harden
J. Helfrich
BT46/75



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January 10, 1991

To: Daron Haddock

From: Sharon Falvey, Reclamation Hydrologist

Re: Substation Amendment (submitted November 9, 1990), Southern Utah Fuel Company (SUFCO), Convulsion Canyon, Sevier County UT, ACT 041/002 90F

Summary:

SUFCOs proposed substation pad is adjacent to the existing disturbed areas in East Spring Canyon. Review of the submitted proposal indicated hydrology related deficiencies are present. These deficiencies are presented in the following Analysis.

Analysis:

1. The proposed amendment indicated the present sediment pond is inadequately sized for the addition disturbance from the substation pad. The calculation estimated an increase in run off by 0.02 acre-ft for a 10 yr-24 hr event.

The permittee has committed to enlargement of the pond to include the run off volume for the substation in 1991 but, would like to award construction bids in February. R614-301-742.212 states that "Siltation structures for an area will be constructed before beginning any coal mining and reclamation operations in that area and, upon construction, will be certified by a qualified registered professional engineer...". Because of weather conditions it is difficult to enlarge the pond during winter and spring seasons, recognizing this difficulty the division could allow the permittee to commence with construction realizing the present pond is slightly undersized. This action would be justifiable according to the probability theory which indicates that the 10 yr. - 24 hr. design event has less than a 6% probability (94 % chance of success) of occurring during the construction period (6 months).

2. The ditch identified on the submitted map has no corresponding design details. The proposed amendment is also lacking in sufficient detail of contributing drainage area, including existing drainage structures that control undisturbed drainage away from the pad, and other sediment control measures. R614-301-711.300 requires each permit application to contain "The methods and calculations utilized to achieve compliance with hydrologic design criteria and plans given under R614-301-740".

Recommendations:

The submitted proposal is not acceptable and should be resubmitted addressing the following changes:

1. Allow the permittee to commence with construction of the substation prior to increasing sedimentation pond size if the substation amendment contains the following:
 - a) A commitment to enlarge the sedimentation pond to contain the design event by July 15, 1991.
 - b) A commitment to submit a certified as built design within 30 days of pond enlargement.
2. The submittal will incorporate in sufficient detail the drainage or sediment control measures to be used in association with the proposed substation including mapping any related drainage controls.



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January 3, 1991

TO: Daron Haddock, Permit Supervisor

FROM: Randy Harden, Sr. Reclamation Engineer *LRH*

RE: Amendment, New Substation, SUFCO, Convulsion Canyon Mine,
ACT/041/002-90F, Folder #2, Sevier County, Utah

Summary:

A proposed amendment for the addition of a new substation was received by the Division on November 9, 1990. The operator proposes to add the new facility on the southwest end of the existing parking lot. The construction of the new substation will increase the disturbed area by approximately 0.27 acres.

Information submitted in the proposal deals primarily with the design and the construction of the new substation facilities. However, information required in conjunction with the proposed amendment has not been included. This information deals primarily with the reclamation plan. Because the operator is in the process of reformatting and resubmitting the entire mining and reclamation plan in its entirety as part of permit renewal, it is anticipated that the inclusion of the new substation will be provided in the reclamation plan at that time.

Analysis:

The new substation is adjacent to the existing disturbed areas. Reclamation treatments for the facilities will be similar to the reclamation work to be accomplished in the surrounding areas. The reclamation plan needs to be revised to include the substation by reference into the reclamation plan.

A significant amount of fill material will be required for the construction of the bin walls and the pad area supporting the new substation facility. The operator has not accurately identified the source and location for this fill material. The operator needs to identify on a map, the location of the borrow material. All borrow material must be

derived from within the permit area and the borrow area must be classified as disturbed area.

Further, the reclamation plan should identify where the fill material used for the construction of the pad will be placed during reclamation activity. These quantities as well as the quantities for concrete and other materials to be demolished or removed for reclamation should also be provided in the plan.

Specific detail for the drainage control of the area has not been sufficiently addressed in the proposal. The operator need to indicate specifically, which areas will drain to the sediment pond facilities and which areas, if any, are proposed for consideration as alternate sediment control areas. All diversion to be constructed in conjunction with the new substation should be designed with appropriate hydrologic calculations.

Additional bonding costs will be incurred as a result of the addition of the new substation. The operator will need to provide a reclamation cost estimate for the applicable reclamation treatments for the new substation facilities. In proportion to the existing disturbed area the increase in cost will be nominal. Contingencies incorporated into the existing bond amount should be sufficient at this time so as not to require an increase in the bond amount. Consequently, no additional bond will be required by the operator for the approval of this amendment. However, in conjunction with the 5-year permit renewal, the operator will be required to submit a detailed reclamation cost estimate for the entire facilities which will include the new substation area reclamation.

The operator needs to show the disturbed area boundary for the proposed facilities. This boundary should envelope all disturbances associated with the construction and the reclamation of the new substation. These boundary changes should be provided on the existing surface facilities map provided in the operation plan.

Recommendations:

Approval of the proposed new substation facilities is not recommended until the following information has been provided to the Division for approval:

1. A new surface mine facilities map showing the location of the new substation, the revised disturbed area boundaries, all diversions and

drainage controls prescribed within the new disturbed area, and the location of the fill materials borrow area.

2. A discussion in the reclamation plan, incorporating the new substation into the reclamation activities for the rest of the mine facilities.
3. Quantify reclamation treatments for the reclamation of the new substation, including demolition and removal, backfilling and grading, drainage restoration, and revegetation treatments for the facilities. These quantities and productivity calculations will be used in conjunction with the permit renewal review in determination of a new bond amount during that later review.