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# State of Utah

DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF OIL, GAS AND MINING

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September 2, 1992

Mr. Ken Payne  
Vice President/General Manager  
Southern Utah Fuel Company  
397 South 800 West  
Salina, Utah 84654

Dear Mr. Payne:

Re: Deficiency Response to Five Year Permit Renewal, Coastal States Energy Company, Convulsion Canyon Mine, ACT/041/002, Folder #3, Sevier County, Utah

Enclosed you will find the results of an administrative review of your initial comments on the SUFCo permit renewal. Hopefully this review will answer the questions you had regarding how to respond to the deficiencies. It appears that many of your initial responses are appropriate and the Division will evaluate them in the review of your official response to the deficiencies.

Please call if you have further questions.

Sincerely,

A handwritten signature in cursive script that reads "Daron R. Haddock".

Daron R. Haddock  
Permit Supervisor

cc: Reader File  
PFO  
L. Braxton  
ADMIREVE.SUF

ADMINISTRATIVE REVIEW OF SUFCO'S INITIAL RESPONSE  
to  
TECHNICAL DEFICIENCY REVIEW  
FOR 1992 PERMIT RENEWAL

This document responds to the initial comments made by SUFCo on the 1992 permit renewal technical deficiency review.. The reader should follow along with SUFCo's comments in order to keep this review in context. Any of SUFCo's comments not listed below are considered to be appropriate responses and should be followed through as outlined in the comment letter dated August 19, 1992.

R645-301-222 Soil Survey

- 1 & 2. SUFCo must insure that the soils information submitted in the original permit application has been transposed to the newly formatted MRP. DOGM realizes that some old information may no longer be available, but as much information that is available should be used to provide soil descriptions and quantify the type and amount of soil available for reclamation.

R645-301-224 Substitute Topsoil

2. Commitment is fine, but SUFCo must provide a description of the trial tests or analyses to be performed to demonstrate the soils suitability.

R645-301-230 Operation Plan

- 1a. Response sounds appropriate as long as the MRP reflects the same thing.
- b. Yes this is required. See R645-301-232.400. The Division may grant exception to topsoil salvage on a case by case basis.
- c. Yes. See R645-301-234.240.
- d. The response seems to clarify the collection process. The MRP does not appear as clear. DOGM wants to insure that subsoil is collected and stockpiled.

R645-301-240 Reclamation Plan

1. DOGM agrees with response, however, the MRP must provide plans for treatment of regraded land which will reduce potential slippage and promote

root penetration. See R645-301-242.200. SUFCo's current plan does not provide for topsoil depths comparable to predisturbance soils.

2. DOGM agrees with this response, however, SUFCo's MRP must have a plan that provides for adequate soil amendments. Apparently the current plan does not.
3. The Division will evaluate this response.

R645-301-322 Fish and Wildlife Information

1. A plan must also be provide to the Division.
2. Response is considered appropriate.
3. The response is considered appropriate and the Division will evaluate.

R645-301-330 Operation Plan

1. Response is considered appropriate.
3. Mitigation plan must be provided to DOGM as well.

R645-301-341.220

1. Mixing seed and hydromulch is not recommended. R645-301-341 requires that the revegetation plan be in conformance with the biological protection performance standards of the State Program. Seed and hydromulch must be applied separately.

R645-301-341.230 Mulching Techniques

1. SUFCo should provide data to support the response statement.
2. Hydromulching can be used. However, SUFCo should reevaluate its use to ensure that it is best technology. Perhaps hay or straw would provide better results.
3. DOGM will evaluate this response.

R645-301-341.250 Success Determination Measures

2. DOGM agrees with the response statement, however SUFCo's MRP currently shows levels of confidence that vary from the specified requirements.

R645-301-411 Land Use Environmental Description

1. Response is appropriate and will be evaluated.

R645-301-412 Reclamation Plan

1. Do comments of the land owners acknowledge the postmining land use? DOGM must be assured that the land owner is in agreement with the postmining land use.

R645-301-512 Certification

1. DOGM will evaluate this response.

R645-301-521.100 Cross-Sections and Maps

1. SUFCo's response is considered appropriate and it will be evaluated.

R645-301-522 Coal Recovery

1. The response is considered appropriate. R2P2 does not need to be part of the PAP. However, a description of the measures to maximize the use and conservation of the coal resource does need to be part of the MRP.

R645-301-526 Mine Structures and Facilities

1. This response will be evaluated.
2. This is probably not a renewal issue, however, current conditions of structures that existed prior to permitting the mine such as roads, culverts, and bridges needs to be known to demonstrate compliance with SMCRA. Since they were built prior to permitting, plans or photographs are required if they are intended to be used after permitting.

3. This response will be evaluated.

R645-301-527.100 Roads

2. This response will be evaluated.

R645-301-527.200

1. This response will be evaluated.

R645-301.531 General Operational Design Criteria

1. DOGM agrees with the response.

R645-301-553.100 Disturbed Area Backfilling and Grading

3. This response will be evaluated. Are there written findings or documentation to support the conclusions? These should be part of the plan.
4. The regulatory basis for this is somewhat indirect. R645-301-542.640 requires disposal of road surfacing material. Regardless, adequate provision for root penetration must be made. Unless foundations and asphalt are broken up, 4 feet of cover is considered appropriate.

R645-301-624.300,310,320

1. Response is appropriate and will be evaluated.
2. Response is appropriate and will be evaluated.

R645-301-624.340 Thickness and engineering properties

1. SUFCo's subsidence control plan appears to be in question here. Since failure of the non-subsidence design has occurred in the past, requests for additional geotechnical data seem to be in order.
3. DOGM agrees with response. These maps do not need to be part of the plan. However, data derived from these maps may need to be part of the subsidence control plan.

R645-301-722.400 Cross-Sections and Maps

1. Response is considered appropriate.
2. Response is appropriate and will be evaluated.

R645-301-724 Baseline Information

1. The regulations require a description of the probable hydrologic consequences of the mining operation and what effects to groundwater are occurring as a result of mining. A discussion of current operational data compared to baseline data is critical to the PHC. Perhaps it was missed in the past reviews but this must be done.

R645-301-731.200 Water Monitoring

1. Response appears to be adequate and will be evaluated.
- 3a. SUFCo must correct the MRP to show the approved monitoring plan.
- 3d. This response will be evaluated.