



State of Utah

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April 1, 1993

TO: File

THROUGH: Daron Haddock, Permit Supervisor *RRTZ*

FROM: James D. Smith *ADS*

RE: Review of Responses to Renewal Deficiencies
Round II - Received March 24, 1993
Southern Utah Fuel Company, Convulsion Canyon Mine
ACT/041/002, Folder #2, Emery County, Utah

SUMMARY

The remaining deficiencies concern results of waste rock analyses. There is no analysis report for the fourth quarter of 1990 either in the M&RP or in the 1990 Annual Report. Analyses for boron, selenium, and alkalinity appear to be done routinely but there are no analysis results reported for these parameters for 1988 and 1989. SUFCO has provided neither this information nor an explanation for its absence.

R645-301-600. Geology.

Deficiency 1. *The geology of the permit and adjacent areas is found in two different parts of the PAP. The permittee shall cross-reference Volume 2, Chapter 6 with Volume 3, Part 2.*

Proposal:

The location of the geologic information on the waste rock disposal site, found in Volume 3, Part 2.2, is referenced on page 6-2 of Volume 3, Chapter 6.

Analysis:

The deficiency has been satisfied by the added cross reference.

Deficiency:

None.

R645-301-622. Cross Sections, Maps and Plans.

Deficiency 1. *Additional information on the Duncan seam has been added to other sections of the MRP but is not included in the description of the Duncan seam on page 6-7.*

Deficiency 2. *The areal extent of the Duncan seam is not clear from descriptions on pages 5-14a and 6-7,*

Proposal:

The description of the Duncan seam on page 6-7 has been revised.

The description on page 6-7 has been revised to reflect the

unsplit portion as being less than 50 acres to match the description on page 5-14a.

Analysis:

The description of the Duncan seam on page 6-7 has been expanded to provide information consistent with that presented in other sections of the M&RP. The areal extent of the unsplit coal has been clarified as part of this additional information.

Deficiency:

1. None.

R645-301-624. Geologic information

1. *Requests for confidentiality remain in the MRP on page 6-11, in Section 6.2.4.1 under the heading Drill Logs and Chemical Analysis and in Section 6.2.4.3 under Lithologic Logs.*

Proposal:

The requests for confidentiality have been revised to comply with R645-301-624.

Analysis:

The request that cross sections, maps, and plans be kept confidential has been removed. The requests for confidentiality of drill logs, chemical analyses, and lithologic logs (in Appendices 6-1 and 6-2) have been modified to request that access to this information be limited to persons with an interest that is or may be adversely affected as provided under Section 40-10-10(4) of the Act.

Deficiency:

1. None.

R645-301-624.300. Samples from test borings or drill cores

1. *Analysis of samples is stated to have taken place quarterly, but there are gaps or omissions in the sampling record that are not accounted for in the MRP.*
2. *Pre 1991 analysis results for Se, Acid-Base Potential and Alkalinity pe appear to have been omitted when the summary of waste rock analyses in Appendix 6-2 was made.*

Proposal:

The Operator made no response to these deficiencies. The response to the previous deficiency was, "The waste rock site is sampled throughout the quarter as material is put in place. A composite sample is analyzed quarterly."

Analysis:

Results of annual waste rock analyses for 1987 and 1988 are in Exhibit 5 of Volume 3. A summary showing those annual tests and quarterly analyses from the last quarter of 1988 to the third quarter of 1990 is in Appendix 6-2. The last quarter of 1990 is missing from this summary. Waste rock analysis reports for the first and second quarter of 1991 are also in Appendix 6-2, but reports for the last two quarters of 1991 are not there. Reports from all four quarters of 1991 and 1992

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are in the 1991 and 1992 Annual Reports submitted to DOGM. There are no waste rock analysis reports in the 1990 report, so waste rock analyses results for the fourth quarter of 1990 are not currently available to DOGM from any source.

Samples have been analyzed basically following the DOGM "Guidelines for Management of Topsoil and Overburden for Underground and Surface Coal Mining" (April, 1988), but some analyses appear to have not been reported. Analysis results for selenium, Acid-Base Potential, and Alkalinity *pe* are not shown on the summary in Appendix 6-2, but those three tests are explained in the footnotes and the results may simply have been omitted when the summary was made. Acid Potential and Neutralization Potential were listed, so Acid-Base Potential is readily calculated from the available data. Boron analysis was also either not done or omitted when the summary was made, but boron is not mentioned in the footnotes. Analysis results for all four parameters were reported in the 1991 and 1992 Quarterly and Annual Reports.

Deficiency:

1. The Operator has made no response to these deficiencies.

R645-301-623.300 Subsidence control plan

1. *The 1990 Subsidence Report, including Maps 1 and 2, is referenced as part of the MRP but the maps are not included in the MRP.*

Proposal:

Copies of Maps 1 and 2 are included for the 1990 Subsidence Report.

Deficiency:

1. None.

R645-301-700. Hydrology.

1. *The MRP does not contain information on the abandonment of the exploration boreholes that are not being used as piezometers.*

Proposal:

All exploration boreholes that have not been used for piezometers have been plugged properly prior to abandonment as required by the regulatory authority. This plugging was the final step in the drilling process prior to abandonment. The text has been revised accordingly on page 6-14.

Analysis:

The change to page 6-14 states the applicant believes the boreholes have been plugged properly. This is probably more accurate than a flat-out statement that they have been plugged.

Deficiency:

1. None.