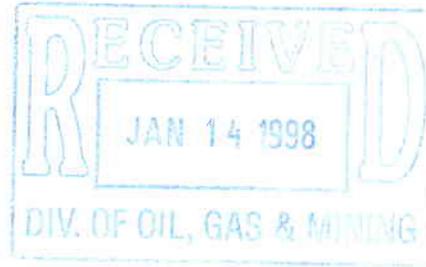


0001



Canyon Fuel Company, LLC
SUFCO Mine
397 South 800 West
Salina, Utah 84654
(435) 637-4880 Fax: (435) 636-4499



January 12, 1998

Mr. Joseph C. Helfrich
Permit Supervisor
Utah Coal Regulatory Program
1594 West North Temple, Suite 1210
P. O. Box 145801
Salt Lake City, UT 84114-5801

Copy Joe
#2

Re: Deficiencies Response, December 30, 1997, ~~Chapter 7 Revision Amendment~~ to MRP, Canyon Fuel Company LLC, SUFCO Mine, ACT/041/002-97A

Dear Mr. Helfrich:

Attached are DOGM Forms C-1 and C-2 and appropriate pages for modification of the Chapter 7 Revision Amendment to the MRP. When this Chapter 7 Revision Amendment to the MRP is approved, SUFCO will want to resubmit the whole Chapter 7 approved text with new page numbering without the redline and strikeout format for final distribution and insertion into the MRP.

The deficiencies and responses are:

1. **R645-301-731.210, -731.220, -731.214, -731.224**, Canyon Fuel Company needs to demonstrate that monitoring locations and parameters are no longer necessary before the Division will approve modification of the operational monitoring plan. There is no discussion of reasons for discontinuing operational monitoring at surface-water monitoring sites 022 and 030. Total hardness, total alkalinity, dissolved iron, and dissolved manganese are currently included in the operational ground- and surface-water monitoring plans but have been omitted from Tables 7-4 and 7-5 without discussion in either the Chapter 7 revision or Appendix 7-17. Flow measurement is discussed in the text, but for clarity flow measurement should be listed with the parameters in Tables 7-4 and 7-5.

Response: *Information in support of the proposal to drop surface-water monitoring sites 022 and 030, and the parameters of total hardness, total alkalinity, dissolved iron, and dissolved manganese from the operational monitoring plans has been added to the text on page 7-48, and 7-48b in the MRP. Water level or flow measurement have been listed with the field parameters and modified dissolved iron and dissolved manganese have been listed with the laboratory parameters in Tables 7-4 and 7-5 on pages 7-45 and 7-47 in the MRP.*

2. **R645-301-722.100, -731.210**, Quarterly measurement of ground-water levels at US-81-3 should continue, if possible. Canyon Fuel Company indicated in the October 28, 1997 letter that water level measurements are frequently not possible due to collapse or blockage of the casing. However, this information is not in the Chapter 7 revision or Appendix 7-17 in support of the proposal to drop this well from the monitoring plan.

Response: *Information in support of the proposal to drop well US-81-3 from the operational monitoring plan has been added to the text on page 7-48 in the MRP.*

3. **R645-301-731.210, -731.220**, In the Chapter 7 revision, 047A is listed with the stream-monitoring sites in Table 7-2 and shown as a stream monitoring site on Plate 7-3. However, in Appendix 7-17 this site is identified as a spring in Table A-1, in Figure 17, and in the text on page 68. According to the October 28, 1997 letter from Canyon Fuel Company, monitoring station 047A is in the stream bed and is a surface-water monitoring site. But it is spring fed except during spring runoff or a storm event. This explanation or description of 047A, which helps clarify the apparent discrepancies between Chapter 7 and Appendix 7-17, is not in the Chapter 7 revision.

Response: *This explanation has been added to the text on page 7-48a in the MRP.*

Enclosed are eight copies of the revisions requested. Please approve these revisions to the MRP. If you have any questions, please contact Wess Sorensen or Mike Davis at (801) 637-4880.

Sincerely,
CANYON FUEL COMPANY, LLC
SUFCO Mine



Kenneth E. May
Vice President and General Manager

Encl.

KEM/MLD:kb

APPLICATION FOR PERMIT PROCESSING

Permit Change <input checked="" type="checkbox"/>	New Permit <input type="checkbox"/>	Renewal <input type="checkbox"/>	Transfer <input type="checkbox"/>	Exploration <input type="checkbox"/>	Bond Release <input type="checkbox"/>	Permit Number: ACT/041/002
Title of Proposal: Deficiencies Response, December 30, 1997, Chapter 7 Revision Amendment to MRP						Mine: SUFCO MINE
						Permittee: CANYON FUEL CO., LLC

Description, include reason for application and timing required to implement:

Updated pages for the Chapter 7 Revision Amendment to MRP.

Instructions: If you answer yes to any of the first 8 questions (gray), submit the application to the Salt Lake Office. Otherwise, you may submit it to your reclamation specialist.

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	1. Change in the size of the Permit Area? _____ acres Disturbed Area? _____ acres <input type="checkbox"/> increase <input type="checkbox"/> decrease.
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	2. Is the application submitted as a result of a Division Order? DO # _____
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	3. Does application include operations outside a previously identified Cumulative Hydrologic Impact Area?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	4. Does application include operations in hydrologic basins other than as currently approved?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	5. Does application result from cancellation, reduction or increase of insurance or reclamation bond?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	6. Does the application require or include public notice/publication?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	7. Does the application require or include ownership, control, right-of-entry, or compliance information?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	8. Is proposed activity within 100 feet of a public road or cemetery or 300 feet of an occupied dwelling?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	9. Is the application submitted as a result of a Violation? NOV # _____
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	10. Is the application submitted as a result of other laws or regulations or policies? Explain: _____
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	11. Does the application affect the surface landowner or change the post mining land use?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	12. Does the application require or include underground design or mine sequence and timing? (Modification of R2P2?)
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	13. Does the application require or include collection and reporting of any baseline information?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	14. Could the application have any effect on wildlife or vegetation outside the current disturbed area?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	15. Does application require or include soil removal, storage or placement?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	16. Does the application require or include vegetation monitoring, removal or revegetation activities?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	17. Does the application require or include construction, modification, or removal of surface facilities?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	18. Does the application require or include water monitoring, sediment or drainage control measures?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	19. Does the application require or include certified designs, maps, or calculations?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	20. Does the application require or include subsidence control or monitoring?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	21. Have reclamation costs for bonding been provided for?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	22. Does application involve a perennial stream, a stream buffer zone or discharges to a stream?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	23. Does the application affect permits issued by other agencies or permits issued to other entities?

Attach 8 complete copies of the application.

I hereby certify that I am a responsible official of the applicant and that the information contained in this application is true and correct to the best of my information and belief in all respects with the laws of Utah in reference to commitments, undertakings, and obligations, herein. (R645-301-123)

Kenneth E. May
Signed - Kenneth E. May, V. P. & General Manager - Date 1/13/98

Subscribed and sworn to before me this 13th day of January, 1998.

Jill White
Notary Public
My Commission Expires: March 28, 2000
Attest: STATE OF Utah
COUNTY OF _____



NOTARY PUBLIC
JILL WHITE
59 W. 200 S.
Gunnison, UT 84634
My Commission Expires
March 28th, 2000
STATE OF UTAH

Received by Oil, Gas & Mining
JAN 14 1998

ASSIGNED TRACKING NUMBER

