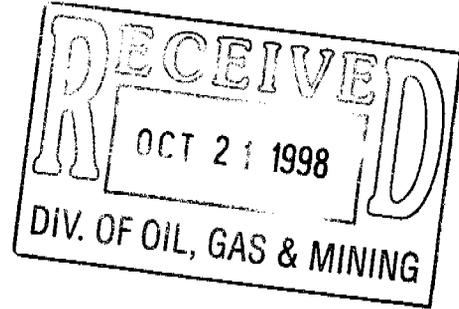




Canyon Fuel Company, LLC
SUFCA Mine
397 South 800 West
Salina, Utah 84654
(435) 637-4880 Fax: (435) 636-4499



October 20, 1998

Permit Supervisor
Utah Coal Regulatory Program
Division of Oil, Gas & Mining
1594 West North Temple, Suite 1210
P. O. Box 145801
Salt Lake City, UT 84114-5801

ACT/041/002 #2
Daron

Re: Deficiencies Response, September 4, 1998, Link Canyon Substation Revision,
Canyon Fuel Company, LLC, SUFCA Mine, ACT/041/002-98A

Dear Permit Supervisor:

Attached are DOGM forms C-1 and C-2 and appropriate pages for modification of the Link Canyon Substation Revision Amendment to the MRP.

This amendment is being revised because a hot zone was encountered while mining toward the outcrop in Link Canyon for the breakout portal. SUFCA encountered warm rock indicating burning coal 2300 feet from the outcrop. This presumed active burn in the coal will not allow mining of the breakout portal at this location. The primary purpose of the breakout in Link Canyon was for access to the proposed Link Canyon substation and power line. The need for power into the mine still exists. To allow power to be taken into the mine three horizontal boreholes are proposed to be drilled under the coal seam to the substation pad area. These boreholes will make a much smaller impact on the environment than the proposed breakout portal and power line up the hill from the substation to the portal. The boreholes will be drilled from inside the mine to the substation pad area to minimize the environmental impact. The boreholes will be cased and cemented to minimize any water seepage from the holes. One borehole will be a two inch diameter casing for phone, monitor and data highway communication from the mine to the substation. Two-five inch diameter casings will be used for the power cables. To further minimize the environmental impact the two inch drill hole will be drilled first and the water needed to flush out the cuttings when the drill holes are reamed out for the two-five inch drill holes will be pumped back into the mine through this hole. The estimated 15 CY of cuttings which will consist of primarily sandstone will be hauled off.

The substation size has doubled over what was originally proposed. This is because the regulators that were to be located just inside of the portal now have to be located in the substation.

The deficiencies and responses to the Link Canyon Substation technical analysis (TA) deficiency letter dated September 4, 1998 are:

1. **R645-301-115**, The application needs to show evidence of approval from the entity with jurisdiction over the Link Canyon road for mining within 100 feet of the road.

Response: *Forest Service EA Approval Letter for Link Canyon Road and Substation has been added to the back of Appendix 1-1, Volume 4 of MRP.*

2. **R645-301-222.100**, Map unit descriptions are given, but no soils map is provided for the Order-2 soil survey. Therefore, the Division is unable to correlate the mapped soils with the proposed disturbance areas for the breakout and substation pad areas. For the Order-1 soil survey, the soils were not classified and, therefore, no soils map for the substation area was generated.

Response: *A Soils map has been added to the "Soil Survey of the Manti-LaSal National Forest" attachment in the "Soils, Vegetation, Wildlife, and Land Use Survey" report at the back of Appendix 2-2, Volume 4 of MRP.*

3. **R645-301-521**, The limit of the Carbon-Emery Area soils survey ends at the Manti-LaSal National Forest boundary which is immediately below south of the proposed substation pad area as shown on Plate 5-2D. This map, however, does not show range and township identification for accurately locating the proposed site.

Response: *Range and township identification has been added to Plate 5-2D for the Link Canyon Substation pad area.*

4. **R645-301-140**, The applicant needs to affirm the qualifications of those conducting the bat survey. The report does not give dates of data collection, and much of the information about the status of two species is incorrect. Either the applicant needs to give correct and complete information or the consultant's report needs to be changed.

Response: *The consultant's report "Bat Survey for the SUFCO Mine, Emery County, Utah, September, 1997" has been revised and is located in the new Appendix 3-8, in Volume 5 of MRP.*

5. **R645-301-234.200**, (1) Topsoil signs need to be placed on the Link Canyon Substation pad out slopes identifying the out slopes as "TOPSOIL." (2) Additionally, since the Link Canyon Substation disturbed area is located within cattle grazing areas

of the U.S. Forest Service, the pad out slopes need to be fenced to prevent damage from cattle grazing to the stockpiled topsoil.

Response: *(1) Reference to Topsoil signs has been added to the text on page 2-16 and 5-13 in the MRP.*

(2) Fencing of the pad out slopes to prevent damage from cattle grazing has been added to the text on page 2-12 in the MRP.

6. **R645-301-242**, The applicant needs to provide additional measures and other soil stabilization techniques (e.g., deep gouging) to help assure reclamation success and which will accomplish the following:

- alleviate soil compaction
- increase soil stability
- increase water harvesting

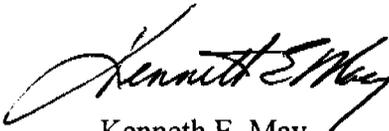
Response: *Additional measures and other soil stabilization techniques have been added to the text on pages 2-17 and 2-18 in the MRP.*

7. **R645-301-244**, Fence reclaimed pad, access road and affected slopes to prevent damage from cattle grazing during reclamation.

Response: *Fencing of the reclaimed pad, access road and affected slopes to prevent damage from cattle grazing during reclamation has been added to the text on pages 2-19 and 5-58 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 (435) 637-4880.

Sincerely,
CANYON FUEL COMPANY, LLC
SUFCO Mine



Kenneth E. May
General Manager

Encl.

KEM/MLD:kb

P:\GOVT1998\DOGMMRPLINK3LTR

APPLICATION FOR PERMIT PROCESSING

<input checked="" type="checkbox"/> Permit Change	<input type="checkbox"/> New Permit	<input type="checkbox"/> Renewal	<input type="checkbox"/> Transfer	<input type="checkbox"/> Exploration	<input type="checkbox"/> Bond Release	Permit Number: ACT/041/002
Title of Proposal: Deficiencies Response, September 4, 1998, Link Canyon Substation						Mine: SUFCO MINE
Revision, 98A						Permittee: CANYON FUEL CO., LLC

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

Revision Number 3 for Link Canyon Substation.

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 checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	1. Change in the size of the Permit Area? _____ acres Disturbed Area? 0.94 acres <input checked="" 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 checked="" type="checkbox"/> Yes	<input 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 checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	13. Does the application require or include collection and reporting of any baseline information?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	14. Could the application have any effect on wildlife or vegetation outside the current disturbed area?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	15. Does application require or include soil removal, storage or placement?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	16. Does the application require or include vegetation monitoring, removal or revegetation activities?
<input checked="" type="checkbox"/> Yes	<input 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 checked="" type="checkbox"/> Yes	<input 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 checked="" type="checkbox"/> Yes	<input 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)

Signed - Kenneth E. May 10/20/98
 Signed - Kenneth E. May, General Manager - Date

Subscribed and sworn to before me this 20th day of Oct. 1998.

Ella Ruth Wayman
 Notary Public
 My Commission Expires: _____
 Attest: STATE OF _____
 COUNTY OF _____

Notary Public
ELLA RUTH WAYMAN
 30 North 500 West
 Aurora, Utah 84620
 My Commission Expires
December 16, 1998
 State of Utah

Received by Oil, Gas & Mining

RECEIVED

OCT 21 1998

DIV. OF OIL, GAS & MINING

ASSIGNED TRACKING NUMBER

Application for Permit Processing Detailed Schedule of Changes to the MRP

Title of Application: Deficiencies Response, September 4, 1998, Link Canyon Substation Revision, 98A	Permit Number: ACT/041/002 Mine: SUFCO MINE Permittee: CANYON FUEL CO., LLC
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Provide a detailed listing of all changes to the mining and reclamation plan which will be required as a result of this proposed permit application. Individually list all maps and drawings which are to be added, replaced, or removed from the plan. Include changes of the table of contents, section of the plan, pages, or other information as needed to specifically locate, identify and revise the existing mining and reclamation plan. **Include page, section and drawing numbers as part of the description.**

			DESCRIPTION OF MAP, TEXT, OR MATERIALS TO BE CHANGED
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Pages 1-35, 1-36 and 1-37 in Chapter 1, Volume 1 of MRP.
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Chapter 2 complete, Volume 1 of MRP.
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Pages 3-iv, 3-6, 3-7, 3-11, 3-31, 3-34, and 3-35 in Chapter 3, Volume 1 of MRP.
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Pages 4-6 and 4-14 in Chapter 4, Volume 1 of MRP.
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Chapter 5 complete, Volume 1 of MRP.
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Pages 7-26 to 29, 7-35, 7-36, 7-47 to 58, 7-69 to 75, and 7-77 in Chapter 7, Volume 2 of MRP.
<input checked="" type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Page 7-29A in Chapter 7, Volume 2 of MRP.
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Pages 8-2 and 8-6 in Chapter 8, Volume 2 of MRP.
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Plates 5-2A, 5-2B, 5-6, and old plate 5-3 with new plate 5-3A in Chapter 5, Volume 1 of MRP.
<input checked="" type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Plate 5-2C, 5-2D, and 5-3B in Chapter 5, Volume 1 of MRP.
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Map 2 in Volume 3 of MRP.
<input checked="" type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Add USFS Construction, Operation and Maintenance of 69Kv Powerline, Substation, and Breakout in Link Canyon Consent Letter at the back of Appendix 1-1, Volume 4 of MRP.
<input checked="" type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Add Link Canyon Newspaper Advertisement Affidavit of Publications at the back of Appendix 1-3, Volume 4 of MRP.
<input checked="" type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Soils, Vegetation, Wildlife, and Land Use Survey at back of Appendix 2-2, Volume 4 of MRP.
<input checked="" type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	New Appendix 2-6 Link Canyon Substation Soil Investigation in Volume 4 of MRP.
<input checked="" type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	New Appendix 3-8 Bat Survey for the SUFCO Mine in Volume 5 of MRP.
<input checked="" type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Cultural Resource Evaluation at back of Appendix 4-2, Volume 6 of MRP.
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Appendix 5-3 in Volume 6 of MRP.
<input checked="" type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Add new pages of Revised Bond calculations at the front of Appendix 5-9, Volume 6 of MRP.
<input checked="" type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Add new pages of diversion ditch calculations at the back of Appendix 7-12, Volume 10 of MRP.
<input checked="" type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Add new pages of ASCA calculations at the back of Appendix 7-15, Volume 10 of MRP.
<input type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	
<input type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	

Any other specific or special instructions required for insertion of this proposal into the Mining and Reclamation Plan?

This Submittal supersedes the three previous submittals for the Link Canyon Amendment submitted May 13, 1998, the DOGM Deficiencies Response for the MRP submitted June 10, 1998, and the Link Canyon Amendment Update - SR98-1 submitted June 17, 1998.