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State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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March 18, 1998

Kenneth E. May, General Manager
Canyon Fuel Company, LLC
SUFCO Mine
397 South 8th West
Salina, Utah 84564

Re: Incomplete Revision for Link Canyon Substation and Undermining Box Canyon, Canyon Fuel Company, LLC, SUFCO Mine, ACT/041/002-98A, Folder #2, Sevier County, Utah

Dear Mr. May:

The Division has conducted an initial completeness review of Canyon Fuel's application to allow construction of a portal and substation in Link Canyon and undermine a portion of Box Canyon. Your application cannot be considered administratively complete due to a number of regulatory requirements having not been addressed. Before a complete technical analysis can be conducted, additional information that addresses the regulatory requirements will need to be submitted. The enclosed worksheet identifies those areas where your application is lacking.

Please review it carefully, noting that the categories and review are quite broad in nature. You should also be aware that even though some of the categories may be considered administratively complete, there still may be technical deficiencies that will require correcting. Your response should be geared toward addressing all of the regulatory requirements that fall under each category.

Please provide the required information necessary to address these deficiencies by no later than April 17, 1998.

If you have any questions please call.

Sincerely,

A handwritten signature in black ink that reads "Daron R. Haddock".

Daron R. Haddock
Permit Supervisor

400	Identify Other Mining Operations in US	<u> X </u>	
500	Surface & Mineral Ownership	<u> X </u>	
600	Ownership Contiguous to Permit	<u> X </u>	
700	MSHA Numbers	<u> X </u>	
800	Interest in Contiguous Lands	<u> X </u>	

301-113	Violation Information	<u> X </u>	No changes.
100	Suspension or Revocation Information	<u> X </u>	
300	List of Violations - 3 Previous Years	<u> X </u>	

301-114	Right of Entry	<u> X </u>	No changes
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301-115	Status of Unsuitability Claims	<u> </u>	Need approval from public road authority to mine within 100 feet of a public road. Division needs to provide opportunity for public hearing.
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301-116	Permit Term <u> X </u>	No changes
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301-117Insurance <u> X </u> Proof of Publication <u> X </u> Facilities and Structures Used in Common <u> X </u>	Not yet published.
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301-118	Filing Fee <u> X </u>	
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301-123	Notarized Signature of Responsible Official <u> X </u>	
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301-130	Information Collection: Technical Data Accompanied by Names of Persons or Organizations that Collected and Analyzed the Data - Dates of Collections - and Analysis of the Data and Description of the Methodology Used to Collect and Analyze Data _____	
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301-200	Soils _____	Incomplete. A generalized Order-2 soil survey was used for soil resource information. No soils map with pit locations provided. No topsoil will be salvaged. The Order-2 survey is provided in Appendix 2-2.
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211	Description of Premining Soil Resources _____	An Order-1 soil survey is required to accurately describe the soil resource and assess the 0.14 acre area for soil salvage.
212	Soil Resource Protection Measures _____	<ul style="list-style-type: none"> - None is provided. The amendment states that no soil resource will be protected because of boulders. The Order-2 soil survey shows no boulders in the soil description, only cobbles and stones. - Soil protection measures need to be evaluated using an Order-1 soil survey.
221	Prime Farmland Investigation _____	A Prime Farmland Investigation and determination needs to be provided by the NRCS.
222	Soil Survey _____	<ul style="list-style-type: none"> - An Order-1 soil survey is required for the 0.14 acre disturbance site. - The Order-1 soil survey will meet the standards of the National Cooperative Soil Survey. - The Order-1 soil survey will be performed by a certified soil scientist. - An appropriate soil map delineating the different soils is needed and scaled to meet the standards of the National Cooperative Soil Survey. - Soil identification and descriptions are needed based on the Order-1 soil survey and must meet the standards of the National Cooperative Soil Survey.
224	Substitute Topsoil Info (When Proposed) _____	- None proposed.

230	Operation Plan: Topsoil Handling/Removal/Storage_____	<ul style="list-style-type: none"> - Based on the Order-1 soil survey, soil resource protection needs to be provided. - Describe the methods for removing and storing topsoil, subsoil, and other materials. - Provide testing plan for evaluating topsoil handling and reclamation procedures related to revegetation. - Describe the construction, use, and maintenance of soil handling and storage areas. - If topsoil is not salvaged, substitute topsoil information is required to provide a suitable growth medium for reclamation efforts. This will include, but not be limited to, importing soil materials of the quality and quantity to achieve reclamation.
240	Reclamation Plan: Soil Redistribution/Stabilization_____	<ul style="list-style-type: none"> - The amendment needs to includes plans for soil redistribution, use of soil nutrients and amendments, and stabilization practices.

301-300	Biology _____	See comments below about this section.
320	Vegetation Information _____ X _____	
322	Fish and Wildlife Information _____ X _____	
323	Maps/Photos: Vegetation-Fish-Wildlife Areas _____ X _____	

330	Operation Plan: Vegetation-Fish-Wildlife Protection _____	The existing plan shows how deer winter range will be avoided, but it doesn't say anything about protecting the two eagle nests near the proposed breakout and substation.
341	Reclamation Plan for Revegetation _____ <u>X</u>	
342	Fish & Wildlife Plan for Reclamation Phase _____ <u>X</u>	

301-400	Land Use and Air Quality _____	See comments below about this section.
411	Pre-Mining Land Use Information (Includes Cultural Resources) _____	Application does not include adequate information for the Division to make a recommendation to SHPO about significant archaeological sites. Some information, including parts of the Agapito report, need to be made confidential before this goes out for public comment.
412	Post-Mining Land Use Information _____	Postmining land use information is considered complete. The application proposes an increase in production above what is allowed in the existing Air Quality Approval Order, and it does not show what coordination has been undertaken with the Division of Air Quality to obtain approval for this increase.

301-500	Engineering _____	
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510 and 520	General Description of Operation Plan: (Maps, Locations, Cross-Sections, Narrative, Descriptions & Calculations) _____	Surface facilities map for power lines does not show the disturbed area extending from the substation to the portal.
522	Coal Recovery Description _____ X _____	
523	Mining Methods _____ X _____	
524	Blasting and Explosives Plan _____ X _____	
525	Subsidence Control Plan _____ X _____	
526	Mine Facilities Description (Narrative, Plans, Maps) Including Existing Structures & Support Facilities _____	See above.
527	Transportation Facilities (Including Plans & Maps) _____ X _____	
528	Coal Mine Waste Plans (Description & Designs) _____ X _____	
529	Management of Mine Openings (Design) _____ X _____	
531	General Plans for Structures _____ X _____	
532	Sediment Control _____	The applicant has not discussed sediment control for the Link Canyon access.
533	Impoundments _____ X _____	

301-534	Roads (Plans, Drawings, Designs, & Specifications) <u> X </u>	
535	Spoil <u> X </u>	
536	Coal Mine Waste <u> X </u>	
537	Regraded Slopes <u> X </u>	
540 541-542	Reclamation Narrative, Maps and Plans <u> X </u>	
551	Casing and Sealing: Underground Openings <u> X </u>	
553	Backfilling and Grading Description <u> X </u>	

301-600	Geology <u> X </u>	
621	Description of Geology (Permit & Adjacent Area) <u> X </u>	
622	Geologic Cross-Sections, Maps, and Plans <u> X </u>	
630	Plans for Casing and Sealing Holes <u> X </u>	

301-700	Hydrology _____	The applicant has not supplied sufficient information to describe the hydrologic impacts and sediment controls facilities for the Link Canyon Breakout and Substation.
721	Description of Hydrologic Resources: (Permit and Adjacent Area) _____	
722	Cross-Sections and Maps: Subsurface Water - Surface Water - Monitoring Stations - Wells _____	Maps do not give sufficient detail to establish hydrologic characteristics, impacts or control for the Breakout and Substation.
723	Sampling and Analysis _____	The applicant has not supplied water quality data to establish baseline characteristics for Link Canyon.
724	Baseline Information: Ground Water - Surface Water - Geology - Climatological & Supplemental; If Needed _____	None for Link Canyon.
728	PHC Determination _____	None for Link Canyon.
730	General Operation Plan: Minimize Disturbance to Hydrologic Balance & Compliance with Clean Water Act _____	None for Link Canyon
731	Ground and Surface Water Protection _____	None for Link Canyon
732	Ground and Surface Water Monitoring _____	

301-740	Plans and Designs: Operation and Reclamation Plan Sediment Control Measures _____ Siltation Structures _____ Sediment Ponds _____ Other Treatment Facilities _____ Diversions _____ Road Drainage _____ Impoundments _____ Discharge Structures _____ Disposal of Excess Spoil _____ Coal Mine Waste _____ Disposal of Non-Coal Mine Waste _____ Casing and Sealing of Wells _____	None for Link Canyon
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301-800	Bonding and Insurance _____	See comment below.
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820	Applicant: Have Adequate Bond at Permit Issuance <u> X </u>	
830	Bond Estimate and Calculations Provided _____	No revised figures provided.
890	Certificate of Insurance Provided <u> X </u>	

302-200	Special Categories of Mining _____	N/A
210	Experimental Practices Mining _____	N/A
220	Mountaintop Removal Mining _____	N/A
230	Steep Slope Mining _____	N/A
240	Auger Mining _____	N/A
250	In Situ Processing Activities _____	N/A

302-260	Coal Processing Plants (Not Located Within Permit Area of Mine) _____	N/A
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270	Variances From Approximate Original Contour Restoration Requirements _____	N/A
280	Variances for Delay in Contemporaneous Reclamation Requirement in Combined Surface and Underground Coal Mining Activities _____	N/A
290	Small Operator Assistance Program (SOAP) _____	N/A

302-300	Special Areas of Mining _____	N/A
301	Prime Farmland _____	
302	Alluvial Valley Floors _____	