



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

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March 27, 2001

Ken May, General Manager
Canyon Fuel Company, LLC
397 South 800 West
Salina, Utah 84654

Re: Findings for Permit & Disturbed Area, Canyon Fuel Company, LLC, SUFCO Mine,

C/041/002-AM01A, Outstanding File

Dear Mr. May:

The above-referenced amendment has been reviewed and there are deficiencies that must be adequately addressed prior to approval. A copy of our Technical Analysis is enclosed for your information. In order for us to continue to process your application, please respond to these deficiencies by April 27, 2001.

If you have any questions, please call me at (801) 538-5325 or Wayne Western at (801) 538-5263.

Sincerely,

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

Daron R. Haddock
Permit Supervisor

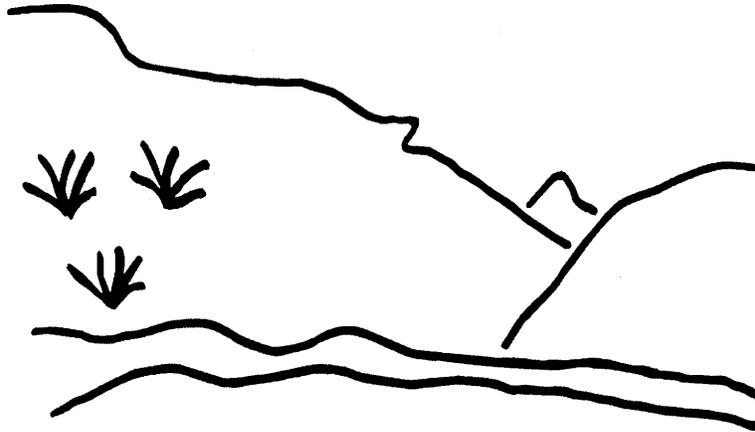
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Enclosure:

cc: Price Field Office

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State of Utah



Utah Oil Gas and Mining

Coal Regulatory Program

SUFCO Mine
Permit & Disturbed Area Boundary
C/041/002-AM01A
Technical Analysis
March 26, 2001

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INTRODUCTION

TECHNICAL ANALYSIS

INTRODUCTION

On February 20, 2001, the Division received AM01A for the SUFCo Mine. The amendment revised, corrected and clarified the permit and disturbed acreage, and boundaries. In addition to the revised text and Plate 5-6, the permittee also included a copy of Plate 5-6 in an AutoCAD file. The Division reviewed the text and maps. The Division needs clarification on why the road and underground utilities between the main mine site and the water tank site were not included in the disturbed area. The Division also needs an AutoCAD copy of the waste rock.

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INTRODUCTION

SUMMARY OF OUTSTANDING DEFICIENCIES

SUMMARY OF OUTSTANDING DEFICIENCIES

The Technical Analysis regarding the proposed permit changes is not complete at this time, pending submittal of additional information by the permittee and further review by the Division, to address outstanding deficiencies in the proposal. A summary of those outstanding deficiencies is provided below. Additional comments, concerns and deficiencies may also be found within the analysis and findings made in this Draft Technical Analysis which have not been presented in this summary. Upon finalization of this review, any outstanding deficiencies will be evaluated for compliance with the regulatory requirements. Such deficiencies may be conditioned to the requirements of the permit issued by the Division, result in denial of the proposed permit changes, or may result in other executive or enforcement action as deemed necessary by the Division at that time to achieve compliance with the Utah Coal Regulatory Program.

Accordingly, the permittee must address those deficiencies as found within this Draft Technical Analysis and provide the following, prior to approval, in accordance with the requirements of:

- R645-301-121.200 and R645-301-521.163**, The permittee must either include the utility corridor that connects the water tank area with the main mine site or show why the utility corridor is excluded from being in a disturbed area. See the analysis section for reasons why the utility corridor could be excluded from being in a disturbed area 6

- R645-301-521.190**, The permittee must show the location of the waste rock site on Plate 5-6 in terms of township, range and section, and State Plane Coordinates. 7

- R645-301-521**, The permittee must show the location of the waste rock site on Map 2 of Chapter 3 in terms of township, range and section, and State Plane Coordinates. 7

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SUMMARY OF OUTSTANDING DEFICIENCIES

OPERATION PLAN

MINING OPERATIONS AND FACILITIES

Regulatory Reference: 30 CFR 784.2, 784.11; R645-301-231, -301-526, -301-528.

Analysis:

General

Amendment AM01A revised, corrected and clarified the permit and disturbed acreage, and boundaries. Those modifications to the text are as follows:

- An unnamed table on page 1-37 that list the acreage in the disturbed areas, the actual acreage that has been disturbed and the site description.
- Acreage at the waste rock site on page 2-8 and 4-2.

The information in the revised text shows each disturbed area within the permit boundaries and the acreage. The Division used the AutoCAD file to verify the disturbed acreage. There were minor differences between the acreage listed on page 1-37 and the area calculated by AutoCAD. The Division assumes that part of the problem could be that the areas on Plate 5-6 were digitized from other maps that were used for area calculations. The Division does not consider the differences to be significant at this time. For consistency the Division will consider the acreage list on page 1-37 to be official acreage. The Division will verify the location of the disturbed area boundaries and acreage using a GPS system at a later time.

The Division noticed that the main mine disturbed area and the water tank disturbed area were not connected. Since waterlines and cables are buried beside the U.S.F.S. public stock trail the Division needs to know why the utility corridor was not included in the disturbed area boundaries. The Division reviewed the MRP and did not find any reason why the utility corridor was not included in the disturbed area boundaries. To the contrary on page 5-10 of the MRP the permittee states:

This road (East Side U.S.F.S. Public stock trail) has historically been used to herd livestock between grazing allotments during seasonal changes. SUFCo Mine also uses portions of this road to access the mining operation's electrical and water supply systems.

The permittee needs to either include the utility corridor in the disturbed area boundaries or state why that area should be excluded. One possible reason for excluding the area is that not additional work will be done in the area and during reclamation the water lines will be sealed

OPERATION PLAN

from inside the disturbed areas and left in place. If the permittee wants to exclude the utility corridor from being in a disturbed area then they must state those reasons in the MRP.

Findings:

Information provided in the proposed amendment is not considered adequate to meet the requirements of this section. Prior to approval, the permittee must provide the following in accordance with:

R645-301-121.200 and R645-301-521.163, The permittee must either include the utility corridor that connects the water tank area with the main mine site or show why the utility corridor is excluded from being in a disturbed area. See the analysis section for reasons why the utility corridor could be excluded from being in a disturbed area

MAPS, PLANS, AND CROSS SECTIONS OF MINING OPERATIONS

Regulatory Reference: 30 CFR Sec. 784.23; R645-301-512, -301-521, -301-542, -301-632, -301-731, -302-323.

Analysis:

Affected area maps

The permittee revised the Plate 5-6 to show the location of all permit and disturbed area boundaries for the SUFCo mine with the exception of the waste rock site. The Division reviewed the map and an AutoCAD file found that they were adequate.

The Division reviewed Map 2, Underground Development Waste Disposal Site Plan in Chapter 3. The permit and disturbed area boundaries appear correct. However, the Division is unable to determine the location of the waste rock site from the map because it does not show references such as township, range and section, State Plane Coordinates or UTM. Without that information the Division is unable to determine the location of the waste rock site.

The permittee needs show the location of the waste rock site in terms of township, range and section, and State Plane Coordinates on Map 2. The permittee must also give the Division a copy of Map 2 in an AutoCAD file.

Findings:

Information provided in the proposed amendment is not considered adequate to meet the requirements of this section. Prior to approval, the permittee must provide the following in accordance with:

OPERATION PLAN

R645-301-521, The permittee must show the location of the waste rock site on Map 2 of Chapter 3 in terms of township, range and section, and State Plane Coordinates.

R645-301-521.190, The permittee must show the location of the waste rock site on Plate 5-6 in terms of township, range and section, and State Plane Coordinates.

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