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State of Utah

DEPARTMENT OF NATURAL RESOURCES

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Outgoing
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January 3, 2011

Mr. Leon Christensen
2330 East 2210 North
P.O. Box 38
Richfield, Utah 84701

Subject: Response to Public Comment Inquiry dated November 30, 2010

Dear Mr. Christensen:

Thank you for your comment letter that was a result of the public notification published in the Richfield Reaper during the month of October 2010. Your letter was in regard to the SUFCO mine application to expand their lease area further west. The Bureau of Land Management (BLM) has recently issued an approval to lease the coal to SUFCO under environmental assessment UT-070-08-083 in a tract known as the "West Lease". I have included a map – Plate 4 that shows the location of the West Lease Tract. SUFCO has filed an amendment to their existing Division of Oil, Gas and Mining (DOGM) permit modifying their existing boundaries to include the West Lease area. This application was submitted to DOGM on August 30, 2010 and is currently pending an approval once the SUFCO mine provides us with some additional information we have requested.

I have read your letter and can understand the concerns you have with what affect mining could potentially have on the Acord Lakes region. The expansion of mining in the West Lease does bring mining closer to your area of concern. Please note that I have included another map – Plate 2 Workings to show you exactly where the proposed underground workings in the West Lease Tract will be located. These maps are from a document known as a Cumulative Hydrologic Impact Assessment (CHIA) that the Division produces for each of our coal mine permits issued in Utah. The Division is bound by the rules of the Surface Mining Control and Reclamation Act of 1977 and the Utah Administrative Code Coal Rules R645-100 to produce this report which evaluates the overall impact mining activities has to the "hydrologic balance" meaning the relationship between the quality and quantity of water inflow and outflow to an entire drainage basin, aquifers, reservoirs etc. We review all the water resources in the affected watersheds such as lakes, springs, groundwater and make findings on where any possible negative effects of mining could extend. We use the terminology "Probable Hydrologic Consequences" when discussing possible negative impacts from mining. We make these determinations based on information the mine has given us from hydrologic studies that they



have performed in the area, geologic and hydrologic data published by institutions such as the United States Geological Survey, Forest Service studies, and the BLM to name a few, as well as our own assessments based on field visits and consultations with other state and Federal agencies.

To specifically answer some of your concerns regarding the Acord Lakes region, you will note that based on Plate – 4 that the West Lease Tract is located in the East Spring Canyon Watershed (labeled as Unit 1 on the map and shown as a boundary with the blue dashed line). You will also note that our Cumulative Impact Assessment area is defined by a purple line as extending as far as the Acord Lakes Fault, which is topographically represented as a ridge that forms the east side of the Acord Lakes valley. This means that we have determined that any possible negative impacts from mining will only likely extend as far as this boundary. You had mentioned in your letter that you obtain your water from some of the springs. I am not sure which springs you are referring to exactly, but I have requested that SUFCO add the Lizonbee Springs to their existing water monitoring protocol as a condition of approval of this West Lease Tract. Incidentally, as part of their mining permit SUFCO conducts a very comprehensive water monitoring program that monitors multiple springs, groundwater, and surface water in their lease area. These water monitoring data are submitted to DOGM on a quarterly basis and all data is available to the public via the internet. The Division monitors these data on a regular basis to ensure that no anomalies are detected and if they are, we alert the mine right away. If you have questions about viewing the data, I would be happy to provide you with instructions for accessing the information.

The application that SUFCO submitted to expand mining into the West Lease Tract may or may not be available for public viewing at the Sevier County Courthouse. I would suggest that if you decide to view the application at the courthouse, please contact Mike Davis at the SUFCO mine first before you go, to confirm that the application is there before you make the trip. Mike can be reached at (435) 286-4421. Within the application, I would recommend you review the hydrologic report prepared by Petersen Hydrologic LLC in Appendix 7-24. This report gives a very comprehensive discussion of the hydrologic resources in the West Lease area. Another good reference is the DOGM CHIA document that I have previously mentioned. This presents an overall view of the hydrologic resources surrounding the mine. I can provide you with an electronic copy of the CHIA document, or provide you with instructions to view it via the internet.

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Leon Christensen
January 3, 2011

Thank you for taking the time to write your thoughtful letter and for being a concerned citizen. If I can be of further assistance, please call me at (801) 538-5214, or you may contact Daron Haddock the Coal Program Manager at (801) 538-5325.

Sincerely,



April A. Abate
Environmental Scientist II

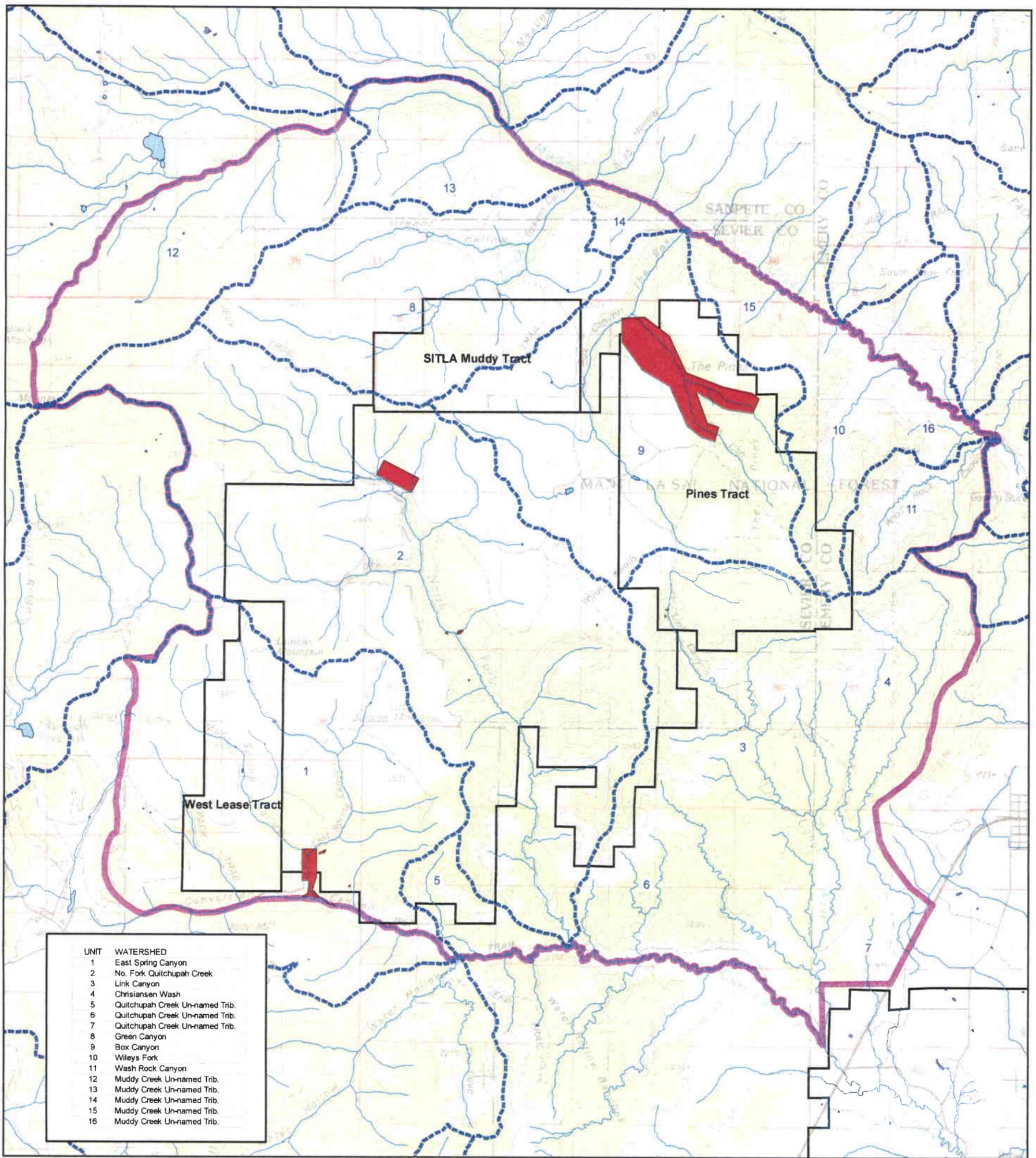


Daron R. Haddock
Coal Program Manager

sqg

cc: Chris Hansen, Canyon Fuel Company
Ken May, Canyon Fuel Company
Dana Dean, DOGM

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UNIT	WATERSHED
1	East Spring Canyon
2	No. Fork Quitchupah Creek
3	Link Canyon
4	Chnsiansen Wash
5	Quitcupah Creek Un-named Trib.
6	Quitcupah Creek Un-named Trib.
7	Quitcupah Creek Un-named Trib.
8	Green Canyon
9	Box Canyon
10	Wileys Fork
11	Wash Rock Canyon
12	Muddy Creek Un-named Trib.
13	Muddy Creek Un-named Trib.
14	Muddy Creek Un-named Trib.
15	Muddy Creek Un-named Trib.
16	Muddy Creek Un-named Trib.

Cumulative Impact Area Quitcupah - Muddy Creek

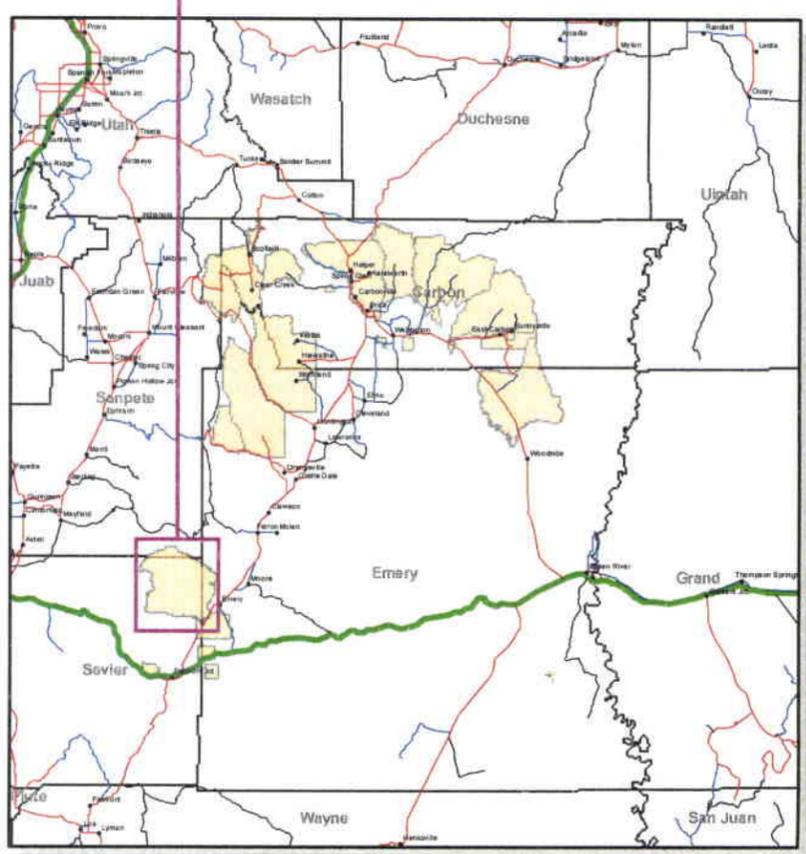
Plate 4

Hydrology Map

October 2010

File: N:/gis/coal/ciamaps/QuitcupahMuddyCk/Hydrology.pdf

- Drainage
- Hydrologic Surface Divide
- Main Road
- Graded Road
- Dirt Road
- Water Body
- Disturbed Area
- Permit Area
- CIA Areas

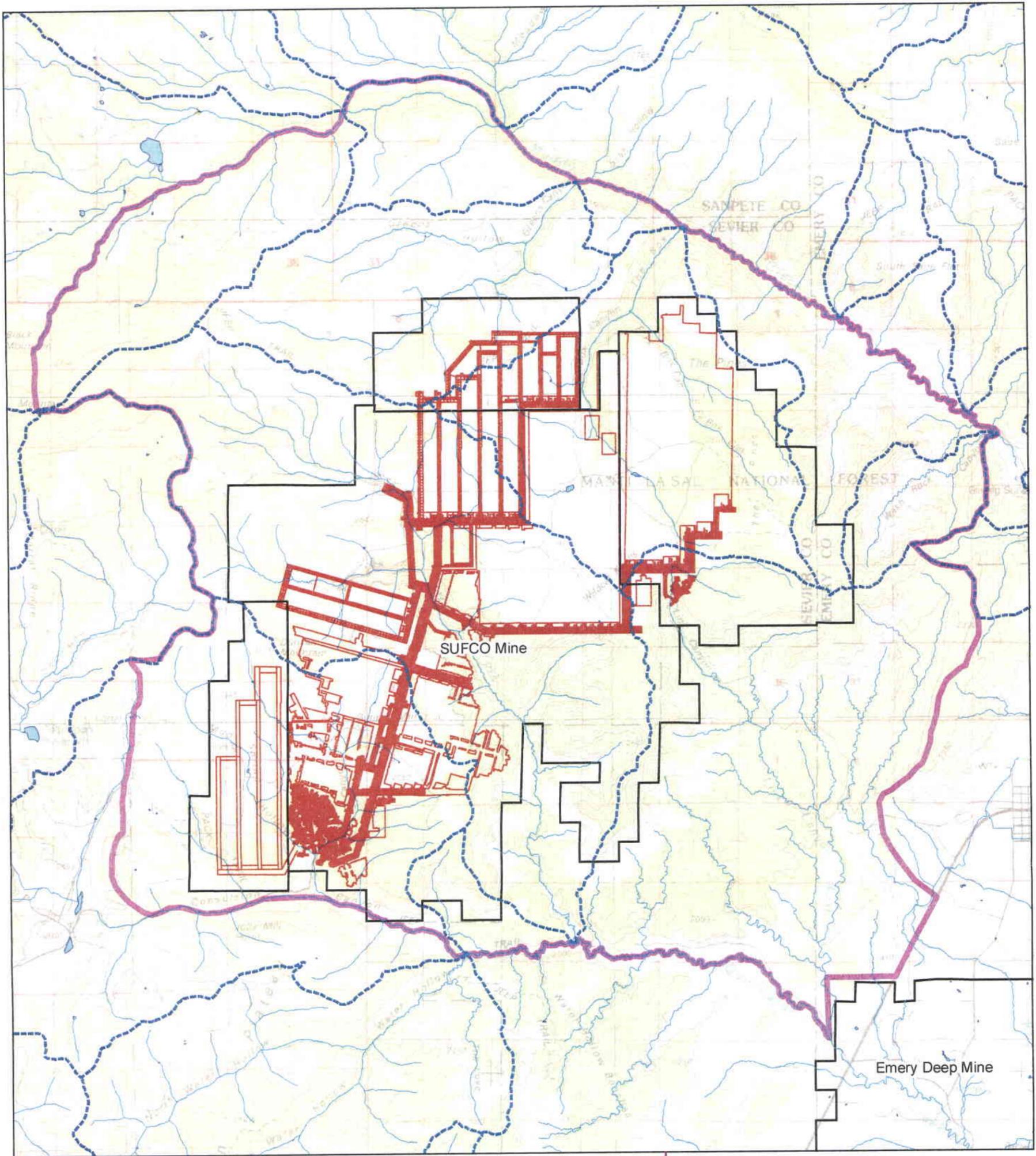


CIA Areas



0 0.2 0.4 0.8 1.2 1.6 Miles

1:85,000



Cumulative Impact Area Quitcupah - Muddy Creek

Plate 2

Workings Map

October 2010

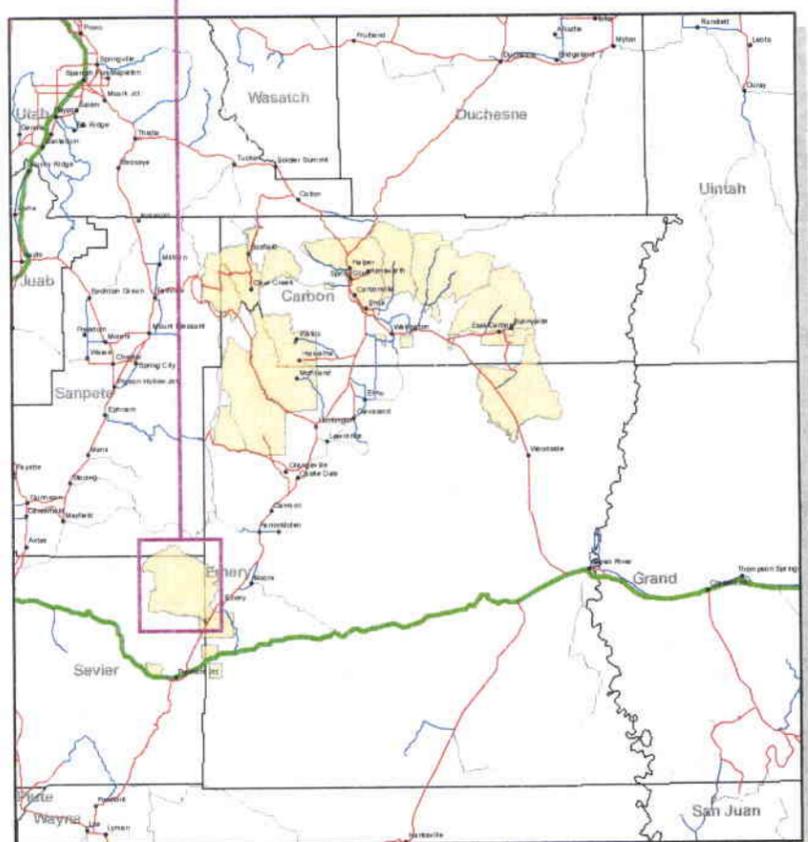
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- Drainage
- Main Road
- Graded Road
- Dirt Road
- Water Body
- Lease Area
- CIA Areas



0 0.3 0.6 0.9 1.2 Miles

1:85,000



CIA Areas