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DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER
Executive Director

Division of Oil, Gas and Mining

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Division Director

July 3, 2013

Ken May, General Manager
Canyon Fuel Company, LLC
597 South SR24
Salina, Utah 84654

Subject: Waste Rock Disposal Site Subsoil Pile As-Built, Canyon Fuel Company, Sufco Mine, C/041/0002, Task ID #4368

Dear Mr. May:

The Division has reviewed your application for inclusion of the Waste Rock Disposal Site Pile As-Built Drawings at the Sufco Mine. The Division has identified deficiencies that must be addressed before final approval can be granted. The deficiencies are listed as an attachment to this letter.

The initials of the deficiencies authors are provided so that your staff can communicate directly with that individual should questions arise. The plans as submitted are denied. Please resubmit the entire application no later than August 5, 2013.

If you have any questions, please call me at (801) 538-5350.

Sincerely,

Steve Christensen
Permit Supervisor

SKC/JCO/ss
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Deficiency List
Task No. 4368
Waste Rock Disposal Site Pile As-Built

Members of the review team with outstanding deficiencies:

Priscilla Burton (PB)

R645-301-121.100 and -121.200, The narrative in Chapter 2 pp. 2-11 through pp.2-22 is a mixture of conjecture and documented soil volumes. To avoid confusion, much of this narrative in chapter 2 section should be rewritten to be current and much could be replaced with a quick reference table as-built volumes of subsoil and topsoil stockpiled at all locations in the permit area. At a minimum, page 2-17 requires revision with updated topsoil volumes taken to the waste rock site from the mine site water tank construction. (PB)

R645-301-231.400, The sedimentation pond stockpile volume and an estimate of the topsoil volume stockpiled on Lift #4 should be included in the accounting of topsoil volumes on WRDS page 3-4. Subsoil and topsoil pile volumes for all stockpile locations might be displayed in a single table for quick reference. (PB)

R645-301-233.300, The laboratory analyses of a sample received by the laboratory June 15, 2010 do not represent the bulk of the material stored in the subsoil stockpile as the analysis predates the sampling commitment in the West Lease Portal Development Task 3780 cover letter dated March 21, 2011. The Division requests that the 11,364 yd³ subsoil stockpile at the waste rock site is cored in three locations. The three composites of the subsoil will represent the 0 - 7ft. ; 7-15 ft.; and 15 - 20 ft. depth from the pile surface. Three composite samples should be sent for analysis of parameters described in Tables 3 and & of the Utah Overburden Guidelines. Once available, the location of the laboratory analysis should be referenced in Chap 2 as demonstrating suitability of the 11,364 yd³ subsoil stored at the stockpile site. (PB)