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Lieutenant Governor

State of Utah

DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER
Executive Director

Division of Oil, Gas and Mining

JOHN R. BAZA
Division Director

April 14, 2014

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

Subject: Vegetation Info & Final for Biological Studies, Canyon Fuel Company, LLC,
Sufco Mine, C/041/0002, Task ID #4513

Dear Mr. May:

The Division has reviewed your application. 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 deficiencies authors are identified so that your staff can communicate directly with that individual should questions arise. The plans as submitted are denied. Please resubmit the entire application.

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

Sincerely,

Daron R. Haddock
Permit Supervisor

DRH/sqs
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Technical Analysis and Findings
Utah Coal Regulatory Program

PID: C0410002
TaskID: 4513
Mine Name: SUFCO MINE
Title: VEGETATION INFO & FINAL FOR BIOLOGICAL STUDIES

Operation Plan

Topsoil and Subsoil

Deficiencies Details:

R645-301-121.200, Appendix 2-9 Link Canyon Portal Vegetation, Aquatic Fauna, and Soil Investigations was updated with information on evaluation dates July and September 2013. Two opposing statements on page 1 of the July 2013 report are confusing. In the first paragraph the report states, "The area at the West Portal has been heavily grazed by cattle this spring" in the 4th paragraph, the report states, "This site has not been grazed by domestic livestock." Please make the appropriate corrects to the report.

pburton

Vegetation

Deficiencies Details:

For the Link Canyon Portal site the vegetation surveys over the past ten years and the most current assessment by Mount Nebo Scientific clearly indicate that the vegetation has become well established and has remained stable over time. Therefore no further monitoring is required at the link Canyon Portal site. The proposed text change to pages 3-19 and 20 is adequate.

For the Color Infrared Aerial Surveys the Division is recommending that the text on page 3-45 remain the same for the time being. In the meantime the division will further research the prospect of discontinuing the monitoring. The permittee should obtain past or recent (2013 or 2014) aerial imagery from one of the referenced web sites for consistent comparison to the imagery that may be required in 2018 or 2019.

The Division will investigate:
What criteria would benefit the comparative analysis of the color infrared aerial imagery and;
The need for mining companies to continue providing this information.

For the "Assessment of the Macroinvertebrates of the South Fork of Quitcupah Creek Emery County, Utah", the report should include a map to appropriate scale that shows the locations of the sampling stations noted in table 1

jhelfric