



GARY R. HERBERT
Governor

SPENCER J. COX
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

May 19, 2014

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

Subject: Waste Rock Sampling Commitment, Canyon Fuel Company, LLC, Sufco Mine, C/041/0002, Task ID #4582

Dear Mr. May:

The Division has reviewed your application 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 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) 538-5265

Sincerely,

Daron R. Haddock
Coal Program Manager

DRH/sqs
O:\041002.SUF\WG4582\Deficiencies.docm



GARY R. HERBERT
Governor
GREG BELL
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

Technical Analysis and Findings

Utah Coal Regulatory Program

PID: C0410002
TaskID: 4582
Mine Name: SUFCO MINE
Title: WASTE ROCK SAMPLING COMMITMENT

Operation Plan

Hydrologic Acid and Toxic forming Materials

Deficiencies Details:

R645-301-121.100, Laboratory analyses provided with the annual reports in 2009 through 2012 indicated pockets of extreme SAR, extreme pH and high boron and elevated selenium in the waste. Thus boron is not the sole concern with the waste and its potential to impact surface/ground waters as stated on WRDS page 3-14 or its potential for interfering with vegetation establishment. The plan should reflect current information in this regard.

R645-301-514.200, -514.210, -514.220, and -514.230, The application states that volumes will be reported annually beginning with the 2015 annual report (WRDS page 3-14). This is not adequate, because the 2015 annual report is not required to be filed with the Division until March of 2016. The volume of deposition be reported with the Quarterly inspection reports and which shall be promptly provided to the Division.

R645-301-553.252, Based upon previous sampling data, the Permittee should include a sampling plan for grabbing composite samples from the final cell #5 surface and slopes (0 - 12 Inches), prior to the 30 inch final soil cover application (described in Vol 3, Sec 4.5), such that four feet of cover is assured.

pburton