



State of Utah

DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER
Executive Director

Division of Oil, Gas and Mining

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Division Director

October 6, 2015

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

Subject: Waste Rock Site Expansion, Canyon Fuel Company, LLC, Sufco Mine,
C/041/0002, Task ID #4982

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,

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

Daron R. Haddock
Coal Program Manager

DRH/sqs
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Technical Analysis and Findings

Utah Coal Regulatory Program

PID: C0410002
TaskID: 4982
Mine Name: SUFCO MINE
Title: WASTE ROCK SITE EXPANSION

Operation Plan

Topsoil and Subsoil

Deficiencies Details:

Findings:

R645-301-121.200, An as-built survey of stockpiled soil will be provided as an update to the MRP (p. 2-13). The Division asks that this statement be clarified to indicate the as-built volumes will be provided for each Phase of operation, within 6 months of soil salvage.

R645-301-121.200, Grubbed vegetation may be shredded and incorporated into the piles (Section 231.100 p. 2-11). A few trees may be placed on top of the piles. The Division requests that shredded vegetation not exceed 30% of the surface and not exceed more than 10% of the total soil volume.

R645-301-121.200, The meaning of the following statement on page 2-19 is not understood by the Division, "Prior to September 2015, there is insufficient information as to what methods or treatments were used on the existing topsoil and subsoil stockpiles." Please elaborate, since records of topsoil and subsoil salvage and treatments at the waste rock site have been kept since its inception.

R645-301-231.100, In Section 531, the plan describes the use of loaders, scrapers, excavators and haul trucks to strip and stockpile topsoil and subsoil. The use of scrapers creates compact stockpiles that are difficult to vegetate. The use of scrapers is not recommended or desirable for topsoil and subsoil salvage. Please remove the use of scrapers from consideration when creating the subsoil and topsoil stockpiles.

pburton

Reclamation Plan

Topsoil and Subsoil

Deficiencies Details:

Deficiencies:

R645-301-240, The application does not meet the requirements for topsoil redistribution because the MRP makes conflicting statements concerning redistribution depth of soils over the waste which do not conform with R645-301-553.250 and

because maps illustrate a 26,934 CY subsoil stockpile remaining at final reclamation, which is not in conformance with R645-301-242.100.

R645-301-242.100, Map 8 Reclamation Contours shows the subsoil stockpile will be reclaimed in place. The volume of this subsoil stockpile is shown as 26,934 CY during Phase 6 as shown (Map 4F). That is enough subsoil to cover the 21 acres of waste rock with an additional 9.5 inches of subsoil. (In accordance with R645-301-242.100, all salvaged topsoil and subsoil will be redistributed over the reclaimed area.

R645-301-121.200, Replacement depths will be confirmed by survey and as-builts will be provided (p. 2-24). The Division requests that the as builts are provided within 6 months of completion of each phase.

R645-301-121.200 and R645-301-553.250 and R645-301-731.300, Where overburden materials are used, the operator commits to demonstrating to the Division that the overburden materials are non-acid and non-toxic forming and non-combustible (p. 5-38). The reader is referred to a waste sampling program in Section 536, however no information on waste sampling could be found. Please provide a sampling program for the waste.

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Stabilization of Surface Areas

Deficiencies Details:

Deficiency:

The application is not in compliance with the requirements of R645-301-244.200. Section 244.100 describes the use of mulch or surface roughening or both. Mulch will be applied at a minimum rate of 1.5 tons per acre (p. 2-27). Section 341.200 states that the use of mulch will be evaluated on a case by case basis, because the use of mulch may delay seed germination. Mulch is much more important as an erosion control method than for seedling establishment (Practical Guide to Reclamation in Utah, 2000). The plan must not waiver on the use of mulch.

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Maps Reclamation Final Surface Configuration

Deficiencies Details:

Deficiency:

R645-301-242.100, Final reclamation Map 8 must show all stockpiled subsoil as redistributed.

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