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DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER
Executive Director

Division of Oil, Gas and Mining

JOHN R. BAZA
Division Director

October 4, 2016

Ken May, General Manager
Canyon Fuel Company, LLC
397 South 800 West
Salina, Utah 84654

Subject: Incomplete Application, Greens Hollow Lease Tract Addition, Canyon Fuel Company, LLC, Sufco Mine, C/041/0002, Task ID #5259

Dear Mr. May:

The Greens Hollow Lease Tract Revision has been reviewed for completeness and found not to be administratively complete at this time. A copy of our review worksheet has been enclosed for your information and records. We are sending this to you so that you may be aware of the information needed to complete your application. Of course, we have all understood that the Greens Hollow lease must be issued in order for you to have right of entry and the application cannot be considered complete until the lease is issued.

In the mean time, as a courtesy we have agreed to proceed with the technical review in an effort to speed the process once the lease is issued. Please be aware that the technical review cannot be completed until the plan is determined to be Administratively Complete.

Thank you for your help during this process. If you have any questions, please feel free to call me at (801) 538-5325.

Sincerely,

Daron R. Haddock
Coal Program Manager

DRH/ss
Enclosure
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**ADMINISTRATIVE COMPLETENESS REVIEW WORKSHEET
(R645-100)**

DATE: 10/03/2016

REVIEWER(S): Suzanne Steab, Lisa Reinhart, Cheryl Parker, Priscilla Burton, Daron Haddock, Amanda Daniels

APPLICANT: Canyon Fuel Company, LLC

MINE NAME: Sufco Mine **FILE NO.:** Task ID #5259x

"Administratively Complete Application" means an application for permit approval or approval for coal exploration, where required, which the Division determines to contain information addressing each application requirement of the State Program and to contain all information necessary to initiate processing and public review.

Directions: The categories listed below correspond to the minimum requirements for information necessary to initiate processing and public review. If a category is checked the Applicant has met the Completeness requirement for that category. If a category is not checked, the Completeness requirements have not been met. If a category is Not Applicable, enter NA in check box. The comments column will identify the deficiency and what is necessary to correct it.

		Comments
301-112	Identification of Interests <u>X</u>	
100	Applicant's Business Structure <u>X</u>	
210	Applicant's Name/Address/Phone <u>X</u>	
220	Resident Agent's Name/Address/Phone <u>X</u>	
230	Name/Address/Phone of AML Fees Payer <u>X</u>	
300	Corporate Structure & Ownership <u>X</u>	
400	Identify Other Mining Operations in US <u>X</u>	
500	Surface & Mineral Ownership <u>X</u>	
600	Ownership Contiguous to Permit <u>X</u>	
700	MSHA Numbers <u>X</u>	
800	Interest in Contiguous Lands <u>X</u>	

301-113	Violation Information	<u>X</u>	
100	AVS Violation Evaluation	<u>X</u>	AVS Evaluation generated on 9/1/16 showed no violations.
200	Suspension or Revocation Information	<u>X</u>	
300	List of Violations - 3 Previous Years	<u>X</u>	Located in General Chapter 1

301-114	Right of Entry	—	The right to enter and conduct mining within the Greens Hollow Lease tract is still pending the lease issuance. It is anticipated that Canyon Fuel Company will acquire the lease, but until the lease is issued, there is no right of entry.
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301-115	Status of Unsuitability Claims	<u>NA</u>	
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301-116	Permit Term	<u>NA</u>	
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301-117	Insurance	<u>X</u>	The applicant has current certificate of insurance on file. Publication following administrative completeness.
	Proof of Publication	<u>NA</u>	
	Facilities and Structures Used in Common	<u>NA</u>	

301-118	Filing Fee	<u>NA</u>	
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301-123	Notarized Signature of Responsible Official	<u>X</u>	
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301-130	<p>Information Collection: Technical Data Accompanied by Names of Persons or Organizations that Collected and Analyzed the Data - Dates of Collections - and Analysis of the Data and Description of the Methodology Used to Collect and Analyze Data</p>	<p>—</p> <p>Appendix 3-4 Raptor and General Avifauna Studies (Confidential) 2013. Tetra Tech.</p> <p>Appendix 3-15 Wildlife Technical Report (Confidential) 2014. Cirrus Ecological Solutions, LC.</p> <p>Appendices 4-2 Muddy Creek Technical report: Heritage Resources (Confidential) 2004. Cirrus Ecological Solutions, LC.</p> <p>Appendix 4-5 Cultural Resource Memorandum of Agreement Manti La Sal National Forest and SHPO (Confidential). 2001</p> <p>Appendix 4-6, Cultural Resource Documentation (Confidential) COULD NOT BE FOUND with this application.</p> <p>Appendix 6-4 Geology Technical Report Greens Hollow Tract. 2014. Paul B. Anderson, PG and Cirrus Ecological Solutions, LC.</p> <p>Appendix 7-27 Surface and Ground Water Report prepared for BLM & USFS. 2014. Cirrus Ecological Solutions, LC and Norwest Applied Hydrology</p> <p>2015. Final Supplemental Environmental Impact Statement, Chapter 4, pages 149 - 150, and selected water data and grazing allotment map.</p>
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301-200	<p>Soils</p>	<p>X</p> <p>The application adds BLM Greens Hollow Lease UTU-84102 within T. 20 S., R. 4 E., Sec 36, 14, 23, 24; and T 20 S., R. 5 E. Sec. 19, 20, 21, 28, 29, 30, 31, 32, and Sec 33; and T 21 S, R 4 E Sec 1, 2, 11, 12, 13, and 1; and T 21 S, R 5 E Sec 6. In all, the lease contains 6,696.41 acres of surface managed by Fishlake (79 acres) and Manti LaSal National Forests (the remainder). The application does not describe any surface disturbance. But the application states an increase of 1.234 surface acres of total disturbance (pg 1-13) related to the permitted disturbed area at the waste rock, as well as an actual disturbed area at the waste rock site of 2.557 acres (which should be accounted for in an as-built to the waste rock site and not this Flat Canyon amendment). There is no revision to Chapter 2, Soils, other than a disclaimer that the 2015 FEIS is provided as background. The potential for a ventilation and escapeway shaft facility is anticipated in Section 5.2.6.1 with a statement that permitting of the potetial shaft will follow the acquisition of the Greens Hollow Lease. Confidential Appendix 4-5 Memorandum of Agreement between USFS and SHPO outline requirements of shaft development.</p>
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211	Description of Pre-mining Soil Resources	<u>NA</u>	No surface disturbance described. A very general Order III survey is included as Dwg 2-3.
221	Prime Farmland Investigation	<u>NA</u>	
222	Soil Survey	<u>NA</u>	
224	Substitute Topsoil Info (When Proposed)	<u>NA</u>	
230	Operation Plan Topsoil Handling/Removal/Storage	<u>NA</u>	
240	Reclamation Plan Soil Redistribution/Stabilization	<u>NA</u>	

301-300	Biology	<u>X</u>	
320	Vegetation Information	<u>X</u>	Ch. 3 has been updated to include vegetation in the Greens Hollow tract.
322	Fish and Wildlife Information	<u>X</u>	Section 3.3.3.3 appendix 3-4, and appendix 3-15 include Raptor survey information. Table 3-1 has been updated to include listed species. TES were analyzed in the FSEIS, appendix 3-15.
323	Maps/Photos Vegetation-Fish-Wildlife Areas	<u>X</u>	Plate 3-1 (plant communities and reference), 3-2 (elk range), and 3-3 (Deer range and raptor nests) have been updated to include the Greens Hollow tract.
330	Operation Plan Vegetation-Fish-Wildlife Protection	<u>X</u>	Potential impact to vegetative, fish and wildlife resources and the associated mitigation plan are presented in Sections 3.30 and 3.40 of the approved MRP. In addition, Appendix 3-15 contains a sound monitoring report. Additional monitoring information for the upper reaches of Quitchupah Creek are provided on page 3-46.
341	Reclamation Plan for Revegetation	<u>x</u>	Nothing has been added to the existing reclamation plan. Assuming the Greens Hollow tract has no additional surface disturbance, this is okay. The reclamation plan used to restore the vegetative, fish and wildlife resources to a condition suitable for the postmining land use is presented in Section 3.40.

342	Fish & Wildlife Plan for Reclamation Phase <u>X</u>	Nothing has been added to the existing reclamation plan. Assuming the Greens Hollow tract has no additional surface disturbance, this is okay. The reclamation plan used to restore the vegetative, fish and wildlife resources to a condition suitable for the postmining land use is presented in Section 3.40.
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301-400	Land Use and Air Quality <u>x</u>	Appendix 4-46 is a map showing Greens Hollow range allotments for livestock use. The amendment provides information regarding the DAQ Air Quality Permit but it is not updated with the Greens Hollow Lease.
411	Pre-Mining Land Use Information (Includes Cultural Resources) <u>X</u>	A description of the land use of the Greens Hollow tract is provided on pages 4-7. Land use is consistent with adjacent permitted tracts. The Paiute Indian Tribe, Navajo Nation and Ute Indian Tribe were consulted, no sacred sites were identified in the course of the tribal consultation (FESEIS). Pg. 4-14 contains a description of the cultural resources. Appendix 4-2 Appendix 4-5 contains the cultural resource MOA. The MLS NF and USHPO agreed that the undertaking may have an adverse effect on several archaeological sites eligible for listing. Therefore, several stipulations are required. There is no additional evidence of consultation with DEQ AQ regarding air quality.
412	Post-Mining Land Use Information <u>X</u>	There are no changes to section 4.1.3.1 on page 4-19. PMLU is consistent with premining land use.

301-500	Engineering —	Chapter 5 narrative appears to include addition information regarding conceptual mine plans based off of full extraction mining. Narrative is missing with 522, 523, and 525 regarding the Green's Hollow lease
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<p>510 520</p>	<p>General Description of Operation Plan (Maps, Locations, Cross-Sections, Narrative, Descriptions & Calculations) —</p>	<p>510 Narrative was added stating mine plan assumptions are based on full extraction mining. Plate 5-2C detailing surface portals was updated to show the proposed lease. Plate 5-6 detailing land ownership leases and permit area was also update to include the proposed lease.</p> <p>520 No narrative was added within the application to describe and identify the lands subject to coal mining and reclamation operations over the estimated life of the operations and the size, sequence, and timing of the subareas for which it is anticipated that individual permits for mining will be sought pertain to the Greens Hollow Lease. Plate 5-7 detailing the proposed upper Hiawatha five year min plan was updated to show proposed workings within the Greens Hollow lease. Plate 5-8 was also updated to shoe the same information for the lower Hiawatha five year mine plan. A narrative must also describe the sequencing of operations and any potential surface impacts regarding the Greens Hollow Lease.</p>
<p>522</p>	<p>Coal Recovery Description —</p>	<p>No narrative was added to detail the expected coal recovery and R2P2 details for the Greens Hollow Lease. The permit application will include a description of the measures to be used to maximize the use and conservation of the coal resource. The description will assure that coal mining and reclamation operations are conducted so as to maximize the utilization and conservation of the coal, while utilizing the best technology currently available to maintain environmental integrity, so that reffecting the land in the future through coal mining and reclamation operations is minimized. Plate 5-7 detailing the proposed upper Hiawatha five year min plan was updated to show proposed workings within the Greens Hollow lease. Plate 5-8 was also updated to show the same information for the lower Hiawatha five year mine plan.</p>
<p>523</p>	<p>Mining Methods —</p>	<p>No narrative was added to detail the expected coal recovery details for the Greens Hollow Lease. Each application will include a description of the mining operation proposed to be conducted during the life of the mine within the proposed permit area, including, at a minimum, a narrative description of the type and method of coal mining procedures and proposed engineering techniques, anticipated annual and total production of coal, by tonnage and the major equipment to be used for all aspects of those operations.</p>

524	Blasting and Explosives Plan	<u>X</u>	No blasting over five pounds is expected at the surface. No changes were made the MRP chapter 5.
525	Subsidence Control Plan	—	Plate 10-A and 10-C potential subsidence plate was updated to include the propose lease. Narrative was added to the MRP Chapter 5 Section 5.2.5.1. There is no narrative specific to subsidence controls related to the Green's hollow lease.
526	Mine Facilities Description (Narrative, Plans, Maps) Including Existing Structures & Support Facilities	<u>X</u>	Narrative was added to Chapter 5 Section 5.2.6.1 regarding the Green's Hollow Lease.
527	Transportation Facilities (Including Plans & Maps)	<u>X</u>	No surface operations are considered at the time of this review; therefore no roads are proposed within the Green's Hollow lease.
528	Coal Mine Waste Plans (Description & Designs)	<u>X</u>	Plate 5-11 was update to show the overburden isopach within the proposed lease.
529	Management of Mine Openings (Design)	<u>X</u>	No surface operations are considered at the time of this review; therefore no mine seals are proposed within the Green's Hollow lease
531	General Plans for Structures	<u>X</u>	No surface operations are considered at the time of this review; therefore no sediment control measures are proposed within the Green's Hollow lease.
532	Sediment Control	<u>X</u>	No surface operations are considered at the time of this review; therefore no sediment control measures are proposed within the Green's Hollow lease.
533	Impoundments	<u>X</u>	No surface operations are considered at the time of this review; therefore no sediment control measures are proposed within the Green's Hollow lease.

301-534	Roads (Plans, Drawings, Designs, & Specifications)	<u>X</u>	No surface operations are considered at the time of this review; therefore no roads are proposed within the Green's Hollow lease
535	Spoil	<u>X</u>	No surface operations are considered at the time of this review; therefore no spoil plans are proposed within the Green's Hollow lease.
536	Coal Mine Waste	<u>X</u>	536 A detail of the Refuse pile associated with the Sufco mine remains unchanged in Volume 3 of the MRP.
537	Regraded Slopes	<u>X</u>	No mining or reclamation activities are conducted in the permit area that require approval for regarding steep slopes.

540 541-542	Reclamation Narrative, Maps and Plans	<u>X</u>	No changes were made to the reclamation plan of the Sufco mine within the proposed amendment.
551	Casing and Sealing Underground Openings	X	No changes were made to the reclamation plan of the Sufco mine within the proposed amendment due to no proposed mine openings at this time.
553	Backfilling and Grading Description	<u>X</u>	No changes were made to the reclamation plan of the Sufco mine within the proposed amendment due to no proposed surface support facilities at this time.

301-600	Geology	<u>X</u>	Chapter 6 of the MRP has been updated to include the Greens Hollow Lease tract. A specific geologic report has been added to the MRP to discuss the geology of the tract (Appendix 6-4)
621	Description of Geology (Permit & Adjacent Area)	<u>X</u>	The geology of the Greens Hollow Lease tract has been described. Since this is an extension of an existing mine a lot of the geologic information carries over from the existing mine plan. The formations are essentially the same, although most of the Greens Hollow is a little deeper in the geologic column and is covered by the North Horn formation. A report has been prepared by Paul Anderson specifically for the Greens Hollow tract and is found in Appendix 6-4.
622	Geologic Cross-Sections, Maps, and Plans	<u>X</u>	The Geology Technical Report (Appendix 6-4) contains a General Stratigraphic column (Figure 1) of the Greens Hollow Coal lease tract. It is accompanied by Plated 2 which is a Geologic Fence Diagram of the tract. These adequately describe the stratigraphy of the area. Plate 6-1 of the MRP is the Geology and drill hole location map and has been updated to include the Greens Hollow lease tract.
630	Plans for Casing and Sealing Holes	<u>X</u>	The plan for casing and sealing of wells is found in section 7.6.5 of the MRP. When no longer needed for monitoring or approved for transfer as a sater well, each well will be sealed and backfilled by placing a concrete plug from TD to the surface.

301-700	Hydrology	<u>x</u>	
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721	Description of Hydrologic Resources (Permit and Adjacent Area)	<u>X</u>	Surface and groundwater information is included. A loss/gain study for various streams in the area of the lease have been performed. Stock watering ponds have been identified and monitored. Water rights information is included in appendix 7-1.
722	Cross-Sections and Maps Subsurface Water - Surface Water - Monitoring Stations - Wells	<u>X</u>	Plates 7-2 and 7-3 have been updated.
723	Sampling and Analysis	<u>x</u>	Sampleing has occurred as part of the baseline monitoring by the mine and as part of the EIS preparation.
724	Baseline Information Ground Water - Surface Water - Geology - Climatological & Supplemental; If Needed	<u>X</u>	Groundwater information is presented in 7.2.4.1 of the MRP. Pages 7-16 and 7-20 are specific groundwater information for the Greens Hollow lease.
728	PHC Determination	<u>X</u>	it appears that there has been some updating of the PHC on page 7-38E.
730	General Operation Plan Minimize Disturbance to Hydrologic Balance & Compliance with Clean Water Act	<u>X</u>	Sections of Chapter 7 discuss possible subsidence impacts to water resources.
731	Ground and Surface Water Protection	<u>X</u>	Table 7-2, the water monitoring table, has been revised to include monitoring locations within the Greens Hollow lease.
732	Sediment Control Measures	<u>NA</u>	There is no proposed surface disturbance associated with the Greens Hollow Lease.

301-740	Plans and Designs Operation and Reclamation Plan Sediment Control Measures	<u>NA</u>	
	Siltation Structures	<u>NA</u>	
	Sediment Ponds	<u>NA</u>	
	Other Treatment Facilities	<u>NA</u>	
	Diversions	<u>NA</u>	
	Road Drainage	<u>NA</u>	
	Impoundments	<u>NA</u>	

	Discharge Structures	<u>NA</u>	
	Disposal of Excess Spoil	<u>NA</u>	
	Coal Mine Waste	<u>X</u>	
	Disposal of Non-Coal Mine Waste	<u>NA</u>	
	Casing and Sealing of Wells	<u>X</u>	

301-800	Bonding and Insurance	<u>X</u>	Chapter 8 edits were included within the application
820	Applicant Have Adequate Bond at Permit Issuance	<u>X</u>	Plate 5-2C detailing surface portals was updated to show the proposed lease.
830	Bond Estimate and Calculations Provided	<u>X</u>	Appendix 5-9 in Volume 6 contains the detail reclamation cost estimate. The bond remains unchanged at this point due to no surface disturbances currently planned within the Green's Hollow lease.
890	Certificate of Insurance Provided	<u>X</u>	Narrative was added to Section 8.60 of Chapter 8 detailing the base assumptions of no surface support facilities at the time of this review. The terms and conditions of the liability insurance for the Sufco Mine remain unchanged.

302-200	Special Categories of Mining	<u>NA</u>	
210	Experimental Practices Mining	<u>NA</u>	
220	Mountaintop Removal Mining	<u>NA</u>	
230	Steep Slope Mining	<u>NA</u>	
240	Auger Mining	<u>NA</u>	
250	In Situ Processing Activities	<u>NA</u>	

302-260	Coal Processing Plants (Not Located Within Permit Area of Mine)	<u>NA</u>	
270	Variances From Approximate Original Contour Restoration Requirements	<u>NA</u>	
280	Variances for Delay in Contemporaneous Reclamation Requirement in Combined Surface and Underground Coal Mining Activities	<u>NA</u>	
290	Small Operator Assistance Program (SOAP)	<u>NA</u>	

302-300	Special Areas of Mining	<u>NA</u>	
301	Prime Farmland	<u>NA</u>	
302	Alluvial Valley Floors	<u>NA</u>	

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