

November 21, 2018

Permit Supervisor  
Utah Coal Regulatory program  
Utah Division of Oil, Gas and Mining  
1594 West North Temple, Suite 1210  
PO Box 145801  
Salt Lake City, UT 84114-5801

**Re: Phase Construction Amendment, Canyon Fuel Company, LLC, Sufco Mine, Sufco Waste Rock Site, Permit Number C/041/0002**

Dear Sirs,

A copy of an amendment to the Sufco MRP is attached to this letter which contains clarification on details regarding the construction at the Sufco waste rock site. In a meeting at the Utah DOGM Salt Lake City office on November 2, 2018, details regarding construction activities at the Sufco waste rock site were discussed. It was suggested by Division personnel to add a narrative to the MRP to clarify these activities. This narrative is included in this amendment.

The permittee is needing to screen material in the newly constructed phase 3 cell which would place some material in phase 3 while phase 2 is being filled. The permit text suggests that each phase be constructed in sequence, and this added narrative clarifies the need for placing some material in the next phase.

In addition, clarification regarding the need and use of temporary culverts is included in the narrative. For trucks and construction equipment to access each newly constructed cell pad, temporary culverts will need to be installed. These temporary culverts will be to specification according to culverts approved in the hydrology report (Appendix VII, Volume 3, Sufco MRP). They will be removed as each phase is completed.

The chapter text submitted contains redline/strikeout text. Clean copies of this amendment will include adjusted pagination and updated tables of contents.

If you have questions or need additional information, please contact Bryant Bunnell at (435) 286-4490.

Regards,



Bryant Bunnell  
Environmental Engineer  
Canyon Fuel Company, LLC  
SUFco Mine  
P: (435) 286 – 4490  
E: [bbunnell@wolverinefuels.com](mailto:bbunnell@wolverinefuels.com)

Encl.

cc: DOGM Correspondence File

# APPLICATION FOR COAL PERMIT PROCESSING

Permit Change  New Permit  Renewal  Exploration  Bond Release  Transfer

**Permittee:** Canyon Fuel Company, LLC

**Mine:** Sufco Mine, Sufco Waste Rock Site

**Permit Number:** C/041/0002

**Title:** Phase Construction Amendment

**Description,** Include reason for application and timing required to implement:

**Instructions:** If you answer yes to any of the first eight (gray) questions, this application may require Public Notice publication.

- Yes  No 1. Change in the size of the Permit Area? Acres: \_\_\_\_\_ Disturbed Area: \_\_\_\_\_  increase  decrease.
- Yes  No 2. Is the application submitted as a result of a Division Order? DO# \_\_\_\_\_
- Yes  No 3. Does the application include operations outside a previously identified Cumulative Hydrologic Impact Area?
- Yes  No 4. Does the application include operations in hydrologic basins other than as currently approved?
- Yes  No 5. Does the application result from cancellation, reduction or increase of insurance or reclamation bond?
- Yes  No 6. Does the application require or include public notice publication?
- Yes  No 7. Does the application require or include ownership, control, right-of-entry, or compliance information?
- Yes  No 8. Is proposed activity within 100 feet of a public road or cemetery or 300 feet of an occupied dwelling?
- Yes  No 9. Is the application submitted as a result of a Violation? NOV # \_\_\_\_\_
- Yes  No 10. Is the application submitted as a result of other laws or regulations or policies?  
*Explain:* \_\_\_\_\_
- Yes  No 11. Does the application affect the surface landowner or change the post mining land use?
- Yes  No 12. Does the application require or include underground design or mine sequence and timing? (Modification of R2P2)
- Yes  No 13. Does the application require or include collection and reporting of any baseline information?
- Yes  No 14. Could the application have any effect on wildlife or vegetation outside the current disturbed area?
- Yes  No 15. Does the application require or include soil removal, storage or placement?
- Yes  No 16. Does the application require or include vegetation monitoring, removal or revegetation activities?
- Yes  No 17. Does the application require or include construction, modification, or removal of surface facilities?
- Yes  No 18. Does the application require or include water monitoring, sediment or drainage control measures?
- Yes  No 19. Does the application require or include certified designs, maps or calculation?
- Yes  No 20. Does the application require or include subsidence control or monitoring?
- Yes  No 21. Have reclamation costs for bonding been provided?
- Yes  No 22. Does the application involve a perennial stream, a stream buffer zone or discharges to a stream?
- Yes  No 23. Does the application affect permits issued by other agencies or permits issued to other entities?

**Please attach one (1) review copy of the application.**

I hereby certify that I am a responsible official of the applicant and that the information contained in this application is true and correct to the best of my information and belief in all respects with the laws of Utah in reference to commitments, undertakings, and obligations, herein.

Jake Smith

Print Name

*Jake Smith* 11/21/18  
Sign Name, Position, Date

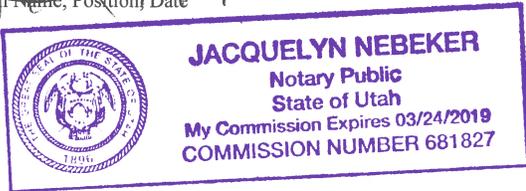
Engineering Manager, 44/20/46

Subscribed and sworn to before me this 21 day of November, 2018

*Jacquelyn Nebeker*  
Notary Public

My commission Expires: \_\_\_\_\_, 20\_\_ }

Attest: State of \_\_\_\_\_ } ss:  
County of \_\_\_\_\_



<b>For Office Use Only:</b>	<b>Assigned Tracking Number:</b>	<b>Received by Oil, Gas &amp; Mining</b>



As one cell is being filled waste rock can be placed in the next cell as needed. If a screen or other equipment is being used in a newly opened cell, waste rock can be placed as a foundation to avoid increased erosion and muddy conditions. Temporary culverts can be added to ditches during construction for access to each phase pad from the primary access road and between phases. It is anticipated that 2-3 temporary culverts could be needed for the construction of each phase. The culverts used will follow specifications in Appendix B-3 (Culvert Sizing) of the Hydrology Report found in Appendix VII, Volume 3 of the SUFCO MRP. Temporary culverts will be removed as construction is completed.

### **532 Sediment Control**

Sediment-control measures for the site area are described in detail in Sections 732 and 742 of this submittal. Runoff-control structures at the WRDS area have been designed to convey runoff in a non-erosive manner. Sediment yields in the permit area are minimized by, disturbing the smallest practicable area during the construction or modification of surface facilities and contemporaneously reclaiming areas suitable for such reclamation.

### **533 Impoundments**

#### **533.100 Slope Stability**

New Pond- The only impoundment with an embankment that will be constructed, used, or maintained by CFC will be the sedimentation pond at the WRDS. This pond is an incised pond with an embankment consisting of native materials. A slope-stability analysis was performed on this pond embankment material and is provided in Appendix II(A).

**Expansion Area** - Text from Earthfax Engineering Group, LLC, Slope Stability Analysis, Appendix II(A)

**Background Information** - This slope stability investigation was performed by EarthFax Engineering Group, LLC (EarthFax). The investigation included the installation of 5 test pits to log soils and collect sufficient soil samples for geotechnical laboratory analysis. These test pits were