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DIV. OF OIL, GAS & MINING

November 27, 2018

Permit Supervisor, Utah 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: Revisions to Waste Rock Site Chapter 7 to Update Water Monitoring Commitments
Canyon Fuel Company, LLC, Sufco Mine, C/041/002

Dear Sirs:

Enclosed with this letter is a copy of the text from the hydrology chapter of the Waste Rock Site permit document. Per a request by Keenan Storrar of the Division we have updated the information concerning water monitoring commitments. The request was made several months ago and if our memory is not all inclusive of the changes requested please contact us with the additional requested changes.

Please contact Vicky Miller at (435)286-4481 if needed.

Sincerely,



John D. Byars
General Manager
Sufco Coal Mine

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

Permit Number: C/041/002

Title: Revision to Waste Rock Disposal Site Chapter 7, Water Monitoring Commitments

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.

Jacob Smith
Print Name

Jacob Smith, 11/27/18, Engineering Manager, 10/29/18
Sign Name, Position, Date

Subscribed and sworn to before me this 27 day of November, 2018

Jacquelyn Nebeker

Notary Public
My commission Expires: _____, 20____ }
Attest: State of _____ } ss:
County of _____



For Office Use Only:	Assigned Tracking Number:	Received by Oil, Gas & Mining
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Observation Well - Ground Water Level
(Sergent, Hauskins & Beckwith's (SHB) Report Appendix II)

Well No.	Sample Date	Water Level (Feet)
3	9/14/83	23.6
	10/3/83	24.8
5	9/15/83	46.7
	10/3/83	48.5
6	9/14/83	37.9
	10/3/83	37
7*	9/15/83	37.1
	10/3/83	44.5
8**	3/7/88	37.07
9**	10/4/95	25.26

* B-7 failed/caved following the monitoring in 1983.

** Information from UDOGM Water Quality Database, Well B-9 has been dry since 2001

GROUND WATER SAMPLING SCHEDULE

	Baseline	Operational	Post Mining
Type of Sampling Site	Observation Wells	Observation Wells (B-3,B-5,B-6,B-8)	Observation Wells (B-3, B-6, B-8)
Field Measurements	Yes	Yes	Yes
Sampling Frequency	At least <u>four</u> samples per annum, at fixed monthly intervals.	<u>Three</u> samples per annum at fixed monthly intervals.	<u>One</u> sample per annum.
Sampling Duration	<u>Two</u> years (six months of data before approval of PAP) have ceased.	Three samples per annum at fixed monthly intervals.	<u>Every</u> year until termination of bonding.
Type of Data Collected and Reported	Water levels and water quality.	Water levels and water quality per operational parameters	Water levels and water quality per operational parameters
Comments	During the year preceding repermitting. One sample per baseline parameter.		

data with quality at these holes being rather consistent. Drill holes number B-5 B-7 and B-9 have not had either sufficient water or a recharge rate which would facilitate water quality sampling. Drill hole number B-8 located above the road appears to have tapped an aquifer which does not continue to the disposal site. This well has a total dissolved solids concentration of approximately 40% of that found in wells B-3 and B-6 and a recharge rate sufficient to preclude detectable draw-down with a bailer.

Point Source Discharge. The water collected and treated in the new (full containment) sediment pond (constructed 2015-2016) will be sampled should it discharge in accordance with R645-301-751. The sample will be analyzed for Total Iron, Total Dissolved Solids, Total Suspended Solid, pH and flow.

731.300 Acid- and Toxic-Forming Materials

Acid- or toxic forming materials are not expected to be produced from the mine. CFC commits to monitor materials produced and analyze them for acid- or toxic-forming materials. If materials are identified, they will be placed in the refuse pile and covered with 4 feet of non-acid, non-toxic, non-combustible materials. Copies of the toxicity/acid-base results from the samples collected are incorporated into the mine's Annual Report.

731.400 Transfer of Wells

The ground water monitoring wells, which exist at the site, will be abandoned following the reclamation of the site when no longer required for ground water monitoring. Therefore, no well transfers are required.

731.500 Discharges

No mines are located in the WRDS, thus no discharge to mines is possible.