

January 4, 2019

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: Revision to M&RP to Suspend Infrared Vegetation Monitoring;
Canyon Fuel Company, LLC, Sufco Mine, C/041/002

Dear Sirs:

Enclosed with this letter is a request to suspend the infrared vegetation monitoring. The monitoring program was initiated to monitor the effect of subsidence on the vegetation communities. According to the text in the permit the monitoring began in 1987, which implies the information has been collected and analyzed over a 31 year period.

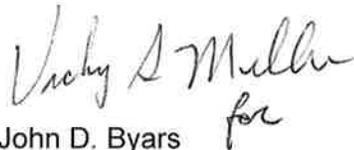
Current environmental personnel are familiar with the information from 2008 thru 2018. The analysis of the infrared photography for the past 10 years has shown no detectable impact on vegetation that can be attributed to subsidence. The evaluation of the precipitation and drought over the ten year period have demonstrated that the drought has impacted the vegetation. In addition, the Fishlake USFS has been conducting controlled burns (approximately 1000 acres) over the monitoring area since 2013.

Due to the advancement of technology several websites can provide the information previously collected and submitted by Sufco. A previous biologist at the Division suggested that the information was available on the following sites: gis.utah.gov/data; nps.gov; gapanalysis.usgs.gov; googleearth.com and available for review if necessary more frequently by accessing one of the sites rather than awaiting the collection and submittal of the information by Sufco.

Sufco is proposing that with the information previously submitted and the current availability of the information from government databases that the infrared vegetation monitoring be discontinued with the 2018 mapping.

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

Sincerely,



John D. Byars *for*
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 M&RP to Suspend Infrared Vegetation Monitoring

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

[Signature]
Sign Name Position Date

_____, Engineering Manager, 01/03/2019

Subscribed and sworn to before me this 3 day of January, 2019

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



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CHAPTER 3

BIOLOGY

Generally, vegetation within the lease and permit areas outside of disturbed areas is protected from mining related impacts, such as subsidence, by the depth of overburden and depth of soil. Experience in mining the Pines and Quitchupah leases has shown that upland vegetation does not appear to be significantly affected by subsidence. Cracks that form in the soil tend to heal quickly and the majority of the vegetation in the area of surface cracks does not appear to be suffering from undue stress. The only cases of damage to vegetation related to mining appears to occur when subsidence cracks form in areas where a brittle sandstone body is near the surface with little soil cover and a crack either visibly bifurcates a plants root system or opens wide enough for soils and small plants to fall into. In a few locations, tree roots have been weakened by surface cracks and have resulted in the trees toppling shortly after the cracking occurs. This impact appears to be typically limited to areas near a canyon rim such as in the West and East Forks of Box Canyon. In areas where there are at least a few feet of soils over bedrock, such as in the previously mined portions of the Quitchupah Lease, this phenomenon has not been observed. Significant impacts to upland vegetation from subsidence are not anticipated in the SITLA Muddy Tract since most of the tract area has a relatively thick mantle of soils.

The depth of overburden in the SITLA Muddy Tract ranges from 900 to nearly 2200 feet. Areas projected to be undermined are covered by a minimum of 1000 feet to a maximum of 2100 feet. Most of the vegetation in the tract is found to be growing in the Price River and the North Horn Formations where the depth of cover is at least 1000 feet. Where these formations are exposed to mining induced subsidence in the Sufco area, the formations tend to react more plastic than brittle and subsidence crack formation is often muted. Subsidence cracks in thick soils and heavily weathered bedrock near the ground surface will frequently heal or fill in a relatively short period of time. Because of the depth and type of cover, Sufco anticipates there will be little impact to upland vegetation due to the subsidence. Subsidence cracks that form that are determined to be a safety hazard will be mitigated as discussed previously in this section.

The applicant has implemented a program to monitor the effect of subsidence on the vegetative communities. The applicant uses color infrared photography (CIR) to document changes to vegetation. This CIR coverage was begun in 1987 and will be updated at least every 5 years thru 2018.