



GARY R. HERBERT
Governor

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Lieutenant Governor

State of Utah

DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER
Executive Director

Division of Oil, Gas and Mining

JOHN R. BAZA
Division Director

March 15, 2019

John Byars, General Manager
Canyon Fuel Company, LLC
597 South SR24
Salina, Utah 84654

Subject: Conditional Approval to Suspend Infrared Vegetation Monitoring, Canyon Fuel Company, LLC, Sufco Mine, C/041/0002, Task #5848

Dear Mr. Byars:

The above-referenced amendment is approved conditioned upon receipt of 2 clean copies prepared for incorporation. Please submit these copies by April 12, 2019. Once we receive these copies, final approval will be granted.

A stamped incorporated copy of the approved plans will also be returned to you at that time, for insertion into your copy of the Mining and Reclamation Plan.

If you have any questions, please call me at (801) 538-5350.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Christensen".

Steve Christensen
Permit Supervisor

SKC/sqs



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Technical Analysis and Findings

Utah Coal Regulatory Program

PID: C0410002
TaskID: 5848
Mine Name: SUFCO MINE
Title: SUSPEND INFRARED VEG MONITORING

Operation Plan

Vegetation

Analysis:

The amendment meets the State of Utah R645-301-331 requirements for vegetation. Color infrared photography (CIR) has been used at SUFCO since 1987 as a means to determine whether subsidence from mining activities was having an effect on area vegetation. After 31 years of gathering this data, no effect has been observed through these means that can definitively be traced to subsidence. Persistent drought conditions in the area are more likely to have an impact on vegetation in the area and it is difficult to determine whether dry vegetation is related to subsidence as opposed to the long-term drought. Furthermore, the data provided by these surveys can more easily be obtained from third parties—such as websites including gis.utah.gov/data, the National Park Service, gapanalysis.usgs.gov, and even Google Earth—than was possible in 1987. Should concern arise in the future regarding subsidence-related vegetative impacts, the necessary data can be gathered from a number of these sources. It should be noted that this amendment does not impact the annual subsidence monitoring and reporting that is outlined in Chapter 5 of the MRP and submitted to the Division as part of SUFCO's annual report.

tmiller