



GARY R. HERBERT  
Governor

SPENCER J. COX  
Lieutenant Governor

# State of Utah

## DEPARTMENT OF NATURAL RESOURCES

BRIAN C. STEED  
Executive Director

### Division of Oil, Gas and Mining

JOHN R. BAZA  
Division Director

January 10, 2020

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

Subject: Conditional Approval of WRS As-Built Information, Company Fuel Company, LLC,  
Sufco Mine, C/041/0002, Task #6043

Dear Mr. Byars:

The above-referenced amendment is approved conditioned upon receipt of 2 clean copies prepared for incorporation. Please submit these copies by February 11, 2020. 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,

Steve Christensen  
Coal Program Manager

SKC/sqs  
cc: Vicky Miller, CFC  
Bryant Bunnell, CFC  
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## Technical Analysis and Findings

### Utah Coal Regulatory Program

**PID:** C0410002  
**TaskID:** 6043  
**Mine Name:** SUFCO MINE  
**Title:** WRS AS-BUILT INFORMATION

#### Operation Plan

##### Topsoil and Subsoil

*Analysis:*

The application meet sthe State of Utah R645 requirements for Soils Operation Plan.

The waste rock site as-built table on p. 2-27 provides as built volumes of topsoil and subsoil salvaged and stockpiled from Waste Rock expansion Phases 1, 2, 3, &4. This table states that there currently is in storage 64,410 CY of topsoil and 55,343 CY of subsoil. Total volume of soil stored is 119,753 CY.

The as-built survey of the Phase ¾ stockpiles is found in Appendix IX. In this appendix, the volume of the subsoil stockpile is 14197.10 net CY. The difference between the as-built salvaged volume and the Phase ¾ volume stated on p. 2-27 is due to the Phase 3 salvaged subsoil placement above Phase 4 subsoil in-situ. The Phase 4 in situ soil and the berms around the pile are all subsoil. Therefore the total volume of Phase 3 and 4 subsoil reported on page 2-27 is 29,493.

Section 252 (Performance standards) has been updated with Phase ¾ topsoil and subsoil salvage information.

pburton

#### Reclamation Plan

##### Topsoil and Subsoil

*Analysis:*

The application meets the State of Utah R645 requirements for Soils Redistribution Plan,

The as-built topsoil/subsoil salvage table on page 2-27 states soil volumes to be redistributed in reclamation over each phase of the waste rock site. The table cites Section 242 for acres of each phase. Section 242, p. 2-21 states the following acreage:

Phase 1 (less roads, storage piles and sediment pond) = 1.28 acres;

Phase 2 = 4.23 acres;

Phase 3 = 5.98 acres;

Phase 4 = 4.93 acres;

Phase 5 = 5.42 acres;

Phase 6 = 2.58 acres. (Phase 6 is the area of roads, stockpiles and sediment pond.)

The total area to be covered with topsoil/subsoil is 24.42 acres. Using the acreage table in Section 242 and the as-built volume chart at the end of Chapter 2, one can calculate that the estimated replacement volumes for phases 1&2, 3 & 4 will generate 4 feet of cover over the waste in each phase.

pburton

## **Bonding and Insurance General**

### *Analysis:*

The amendment meets the State of Utah R645 requirements for General Bonding.

The amendment satisfies the Requirements of R645-301-820 because the topsoil and subsoil volumes have been updated according to the most recent as-built survey. Previously this amendment was found to be deficient because the earthwork costs had not been altered in response to the updated volumes. The new Earthwork costs associated with the Waste Rock Site have been adjusted down slightly to \$812,577, and the updated bond summary has been recalculated to account for the new volumes.

jeatchel