



STATE OF UTAH
NATURAL RESOURCES & ENERGY
Oil, Gas & Mining

Scott M. Matheson, Governor
Temple A. Reynolds, Executive Director
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0011

March 5, 1982

Mr. Richard Dawes
Office of Surface Mining
Brooks Towers
1020 15th Street
Denver, Colorado 80202

RE: Approval to Mine
Federal Coal Leases
Valley Camp of Utah, Inc.
Belina No. 2 Mine
ACT/007/001
Carbon County, Utah

Dear Mr. Dawes:

Please be advised that the Division of Oil, Gas and Mining is prepared to approve plans to allow Valley Camp of Utah, Inc. to mine the main entries into Federal coal leases in their "Belina No. 2 Mine". Any associated development as far as surface facilities are concerned has already been completed. That is to say, there will be no additional surface disturbance created because of this planned advancement in their operations, nor are any environmental impacts anticipated as a result of said development.

So far as this office can ascertain, the only reason the additional mining has not been approved by the Office of Surface Mining is one of semantics. In many other mines throughout Utah and I am sure, many other states as well, the access of a separate seam directly beneath or above the existing mined seam(s) is treated as part of the existing mine or mine plan. Many mines operate in three or more seams on the same property and simply reference the separate seam access as different portal entries. This problem may be resolved by the introduction of the terminology "Belina Complex" for the subdivisions of the No. 1 and No. 2 mines. It appears quite unnecessary to try and differentiate two such interdependent coal extraction programs which occupy practically the same horizontal space and are only separated by a small vertical distance.

In the case for calling this a modification to the existing Belina No. 1 Mine, I suggest that the Office of Surface Mining maintain continuity with the presently agreed upon approvals and permit this extension of the "minor

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modification" for mining the county leases. The semantic adjustment to include both "mines" within the "complex" is just that a linguistic rearrangement. This situation should not be blown out of proportion.

In a phone conversation with Trevor Whiteside, Senior Mining Engineer for Valley Camp of Utah, Inc., on February 23, 1982, the Division was advised that a letter is forthcoming explaining Valley Camp of Utah, Inc.'s recent decision to hire a consulting firm to assist them with a reply to the ACR. This ACR response is expected by the end of May. The Division is prepared to proceed with the technical review of Valley Camp of Utah, Inc.'s complete application upon submission, utilizing the Office of Surface Mining to prepare any necessary environmental assessment, in order to expedite an approval of the mining and reclamation plan, hopefully by the end of this year. Practical experience has indicated that an approved decision document will take at least six months.

The operator has expressed concern over the situation and has indicated that should approval to mine federal coal be denied, Valley Camp of Utah, Inc. will be unable to meet contractual commitments. The Division, on behalf of the operator, would therefore like to urge an expedient resolution of the Office of Surface Mining's immediate concerns and concur with the Division's previously stated position, one of approval.

Sincerely,



JAMES W. SMITH, JR.
COORDINATOR OF MINED
LAND DEVELOPMENT

JWS/TNT:te

cc: W.H. Haynes, Jr., Pres., Valley Camp