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DIVISION OF
OIL, GAS & MINING

February 3, 1984

Memorandum

To: Utah Senior Project Manager, OSM, Denver

Attention: Ms. Sarah Bransom

From: Chief, Branch of Mining Law and Solid Minerals

Subject: Valley Camp of Utah, Inc., Belina Complex, Mining and Reclamation Plan (MRP)

Volume VI, the Technical Deficiency Review of the subject MRP transmitted with your letter of September 29, 1983, has been reviewed for completeness and technical adequacy. We have determined that this information is compatible with the underground mining part of the MRP and 43 CFR 3482.1(c) rules and regulations.

Proposed coal recovery procedures have not changed. We do have concerns with future recovery of the coal resources. Numerous small headwater streams across the mine property have been classified as perennial. There is a natural gas line running north and south over the property and four connecting gas lines running in an east-west direction. The MRP indicates that coal pillars will not be mined under the gas lines or the perennial streams in an area computed by using a 35 degree angle of draw. This coupled with the potential angle of draw problem along the boundaries represents substantial areas across the mine property that can only be first mined. !!

The BLM is the administrator of the Federal leases included in the subject MRP and is responsible to see that the maximum amount of the minable coal is safely and economically mined using current technology and available equipment.

It is not good practice or practical to state at this time how much coal must be left in the undeveloped areas of the mine. As mine development progresses, each problem including the above angle of draw problems should be individually reviewed by management and BLM and possibly other interested parties to determine the best approach for mining safely the maximum amount of coal and give adequate protection to the involved parts of the gas lines and perennial streams. Perennial streams will not be significantly affected by full retreat mining under proper conditions.

Angle of draw data available and being developed for this coal field indicates that the angle of draw selected for the MRP (35°) could be significantly different from the actual angle of draw which results from mining. We expect the actual angle to be considerably less than 35° resulting in substantial reserves remaining unmined in the ground. agreed

Approval of an underground mining plan should allow flexibility in the plan to properly adjust to the problems that will be encountered as the mine develops. Rules and regulations 43 CFR 3481.1 and 43 CFR 3484.1 outline the general obligations of the operator/lessee and the performance standards required for underground mining.

/S/ Jackson Moffitt

cc: Valley Camp
DOGM
Moab District