

Orig Mine files
cc + DRN
R Daniels
S. Henner



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Moab District
P. O. Box 970
Moab, UT 84532

3486
(U-017354)
(U-065)

ACT/cont/lon 1
#2

DEC 05 1984

CERTIFIED MAIL - RETURN RECEIPT REQUESTED
Certification No. 0178

RECEIVED
DEC 07 1984

Mr. R. C. Harris, Executive Vice President
Kanawha & Hocking Coal & Coke
P. O. Box 900
Oil City, PA 16301

DIVISION OF
OIL, GAS & MINING

Dear Mr. Harris:

This letter serves to formally cite your subsidiary, Valley Camp of Utah, Inc., for operating in noncompliance with the underground portion of the approved mine plan of the Belina No. 1 mine and violating regulations contained at 43 CFR 3484.1(b)(4) that require operators to prevent wasting and conserve the recoverable coal reserves as well as to prevent damage and degradation to coal bearing formations.

Specifically, referred to are the excessive entry widths mined in areas of the West Return in South Mains section and in the West Return section. The aforementioned areas were observed by Mr. Allen Vance, staff mining engineer in our Price, Utah, office on his quarterly inspections of September 6, 1984 and November 20, 1984. It is realized that occasional excessive entry widths can occur in mining operations either by operator mistake or natural rib spalling. However, the continuing recurrence of the situation at the Belina mine is the result of poor mining habits that can be corrected by a concerned mine management.

Excessive entry widths have three deleterious effects on the recovery of Federal coal:

- 1) Section productivity is decreased as time is required to install wood cribbing or other forms of roof support.
- 2) The safety of the miners is endangered.
- 3) Pillars adjacent to the extended openings could possibly deteriorate to the point where second mining would be impaired or made impossible and result in the loss of recoverable coal reserves and royalty revenues.

While all of these points should be of concern to Valley Camp management, the potential loss of recoverable reserves is a critical concern to the Bureau of Land Management (BLM).

Mr. Walt Wright, General Manager of the Valley Camp of Utah, Inc. has previously been apprised of BLM's concern and responsibility regarding these erratic mining practices by correspondence dated December 19, 1983 and June 21, 1984 (copies attached). Also, we have discussed the problem on different occasions with Mine Superintendent Virgil Lamb, contends the problem is due to the use of inexperienced mine operators in order to meet excessive contract sale commitments. While BLM appreciates the short-term needs of the situation, it is felt that this is no excuse to endanger the long-term overall recovery of the coal on Federal leases. To date, there has been no effective action taken by local mine management to correct this problem, thus our appeal to you to see if any voluntary action can be taken on your part to achieve an acceptable solution.

In order to abate this notice of noncompliance we must observe a marked improvement in the development of entries and crosscuts at the Belina mine within the next three months. Otherwise, BLM will order cessation of operations in the affected area and/or recommend initiation of cancellation of the Federal lease.

It is the policy of this office to encourage mineral development and our office hesitates use of our limited but drastic enforcement actions, and offer industry every opportunity to comply with Federal requirements. However, repeated disregard of these requirements as well as the lack of using "good mining sense" cannot be tolerated.

As this is a documented decision of the BLM, you are afforded the right of appeal pursuant to 43 CFR Part 4. If you have any questions please do not hesitate to contact this office at (801) 259-6111.

Sincerely,

/s/ Kenneth V. Rhea

ACTING District Manager

Enclosures (2):
2 letters

cc: U-921
OSM, Mr. Alan Kline
DOGM, Diane Nielson
T. Hare (U-065)
Mr. Walt Wright