

To Sue

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3400U-G17354
(U-921)

JIM

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Mr. Allen D. Klein, Administrator
Western Technical Center
Office of Surface Mining
Brooks Towers - 1020 15th Street
Denver, Colorado 80202

DIVISION OF
OIL, GAS & MINING

Dear Mr. Klein:

In your letter dated March 2, 1984 you addressed our concern about the requirement for the Belina Mines Complex that coal pillars will not be mined under the gas pipeline or perennial streams in an area computed by using a 35 degree angle of draw. You referred us to our letter of May 30, 1980 to Belina Coal Mines management which proposed that the 35 degree angle was a preliminary determination and that as mine development continued a more specific angle of draw could be determined and the mine plan altered accordingly. Subsequently, in Belina's Hydrology Update, Volume VI, Appendix N, pages 29-30, the applicant states: "When documentation of the angle of draw can be obtained, a request will be made to reduce the size of the buffer zones accordingly."

We still agree in principle with our May 30, 1980 letter and Belina's statement in their Hydrology Update as it applies to buffer zones under oil and gas lines. We see no alternative at this point in time to mitigate potential subsidence under these lines.

However, an additional major point of concern was generated when it was determined that in addition to the buffer zones required for oil and gas lines, buffer zones are now to be required for numerous small headwater streams, now classed as perennial, which cross the mine property. Many of these drainage features flow intermittently or the flow is minimal. Inclusion of these as protected areas when combined with the protective corridors in effect eliminates all possibility of mining using high capacity, high efficiency mining methods, i.e., longwall. These prohibitions effectively substantially reduce the maximum economic recovery possible in this mine.

Attached is a print (Plate 4-IRP) of a map produced by Vaughn Hansen and Associates showing potential subsidence areas. On this map we have roughly shaded that area from the surface to depth within the 35 degree angle of draw within in which only first mining is allowed as a result of protection for streams or oil and gas lines. This print graphically illustrates the magnitude of the problem of protection as it relates to recovery of the resource.

To our knowledge, 100 years of mining experience in the Wasatch Plateau, Book Cliffs Coal Fields has not shown one instance where subsidence caused a stream to enter a mine or where subsidence has caused more than a temporary impact on the flow rate of any stream or waterway.

We recommend that the hydrologists reappraise their determination of what constitutes a perennial stream and hopefully reduce the number so that we can minimize the coal that cannot be mined if buffer zones under these streams are required.

Sincerely yours,

Jackson W. Moffitt
Area Mining Supervisor

Enclosure

cc: Valley Camp of Utah wo/encl.
DCCR w/encl.

bcc: McKean (2) wo/encl.
Solid File "
Solid Chron "
Dockets (U-942)
DSD/HR

JWMoffitt:la:3/6/84:3041

Document Information Form

Mine Number: C/007/0001

File Name: White Oak - Incoming

To: Allen D. Klein

From:

Person Jackson W. Moffitt - Area Mining Supervisor

Company _____

Date Received: Mar. 12, 1984

Explanation: Map showing potential subsidence areas.

Plate 4-MRP

cc: