



# State of Utah

DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF OIL, GAS AND MINING

Norman H. Bangarter  
Governor  
Dee C. Hansen  
Executive Director  
Dianne R. Nielson, Ph.D.  
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355 West North Temple  
3 Triad Center, Suite 350  
Salt Lake City, Utah 84180-1203  
801-538-5340

March 13, 1992

Mr. Steve Tanner  
Valley Camp of Utah, Inc.  
Scofield Route  
Helper, Utah 84526

Dear Mr. Tanner:

Re: Amendment Deficiencies, Valley Camp of Utah, Belina Mine, ACT/007/001-91A, Folder #3, Carbon County, Utah

Your submittal regarding a mine plan change was received at the Division offices on December 12, 1991 and has been reviewed by our technical staff. At this time your submittal is considered deficient and cannot be approved. Please review the enclosed technical memo, written by Randy Harden, which outlines the deficiencies that need to be addressed. We have also been in touch with the BLM and Forest Service regarding your proposal. Additional information or comments may be coming from them as well.

We encourage you to correct the problems noted in the review memo and resubmit information necessary to process this amendment. Please don't hesitate to call me, Randy Harden, or Rick Summers if you have questions.

Sincerely,

Daron R. Haddock  
Permit Supervisor

cc R. Harden  
R. Summers  
J. Helfrich  
VALLCAMP.SUB



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March 9, 1992

TO: Daron Haddock, Permit Supervisor

FROM: Randy Harden 

RE: Proposed Mine Plan Change, Belina Mine, Valley Camp Coal Company, ACT/007/001-91A, Folder #2, Carbon County, Utah

## Summary:

Valley Camp Coal Company has submitted a proposal to conduct additional mining in the Belina #1 and #2 Mines. Information regarding this proposal was received by the Division on December 12, 1991. The following comments are in regard to that proposal.

## Analysis:

R645-301-521.140. Mine Maps and Permit Area Maps.

## Proposal:

The operator has provided a map entitled Belina No. 2 Mine, Mine Plan Revision, dated 12/11/91 which shows the location of the proposed mining for 1992 through 1994.

## Analysis:

The map provided by the operator is not numbered and the proposed amendment has not been presented in a manner which is suitable for incorporation into the mining and reclamation plan.

Additional maps and drawings must be revised in the plan to incorporate the proposed changes into the plan. A map must be provided which shows the underground workings and the location and extent of areas in which planned-subsidence mining methods will be used and which includes all areas where the measures will be taken to prevent, control, or minimize subsidence and subsidence-related damage (refer to R645-301-525).

## Deficiencies:

Prior to approval of the proposed changes to the mining and reclamation plan, the

operator must provide the following in order to be considered in compliance with the requirements of this section of the regulations:

1. A certified map showing the underground mine workings, the location and extent of the areas in which planned subsidence is to occur.

**R645-301-525. Subsidence.**

**Proposal:**

The operator's letter has referenced the 1984 OSM Technical Analysis and cites a determination that. "...no perennial headwater streams occur within the permit area; therefore, this determination eliminates the applicability of UMC 817.125 regarding subsidence control within the stream buffer zones for the Belina Mine Complex." Additionally, the operator has referenced a "condition" for the restoration of the stream channels should mining activity or subsidence cause a disturbance of the stream flow.

The operator further states that. "Pursuant to applicant's presently approved Subsidence Control Plan, a cooperative agreements was reached with the Manti-LaSal National Forest USDA to monitor subsidence on an annual basis by photogrammetry." The subsidence control plan and the cooperative agreement referenced in this paragraph could not be found within the text of the mining and reclamation plan or within the appendices for the plan.

The operator has also stated that as part of the Subsidence Control Plan is approval from the MMS for using a 35 degree angle-of-draw for limited extraction.

**Analysis:**

In reference to the operator's mining and reclamation plan, under section R614-301-525. The operator indicates that a presubsidence survey was conducted by Valley Camp. This survey was not referenced in the plan and apparently is not included as an appendix to the mining and reclamation plan.

The mining and reclamation plan needs to include a survey which will show whether structures and renewable resource lands exist within the proposed permit area and adjacent area and whether subsidence, if it occurred, could cause material damage and diminution of reasonably foreseeable use of such structures or renewable resource lands. Based on information presented in the plan currently, such structures or renewable resource lands do exist, and that subsidence could cause material damage or diminution of value of foreseeable use of the land. At a minimum, the subsidence control plan which must contain the following information:

1. A description of the method of coal removal, such as longwall mining, room-and-pillar removal, hydraulic mining, or other extraction methods, including the size, sequence, and timing for the development of underground workings;
2. A description of the physical conditions, such as depth of cover, seam thickness, and lithology, which affect the likelihood or extent of subsidence and subsidence-related damage;
3. Except for those areas where planned subsidence is projected to be used, a detailed description of the subsidence control measures that will be taken to prevent or minimize subsidence and subsidence-related damage, including, but not limited to: backstowing or backfilling of voids; leaving support pillars of coal; leaving areas in which no coal is removed, including a description of the overlying area to be protected by leaving the coal in place; taking measures on the surface to prevent material damage or lessening of the value or reasonably foreseeable use of the surface; monitoring, if any, to determine the commencement and degree of subsidence so that other appropriate measures can be taken to prevent or reduce material damage; and, a description of the anticipated effects of planned subsidence, if any.
4. A description of the measures to be taken to mitigate or remedy any subsidence-related material damage to, or diminution in value or reasonably foreseeable use of the land or structures or facilities.

The operator needs to describe in the subsidence control plan, measures consistent with known technology which prevent subsidence from causing material damage to the extent technologically and economically feasible, maximize mine stability, and maintain the value and reasonably foreseeable use of surface lands; or adopt mining technology which provides for planned subsidence in a predictable and controlled manner.

Provisions in the subsidence control plan must include a commitment to correct any material damage resulting from subsidence caused to surface lands, to the extent technologically and economically feasible, by restoring the land to a condition capable of maintaining the value and reasonably foreseeable uses which it was capable of supporting before the subsidence. And, to either correct material damage resulting from subsidence caused to any structures or facilities by repairing the damage or compensate the owner of such structures or facilities in the full amount of the diminution in value resulting from the subsidence. Repair of damage includes rehabilitation, restoration, or replacement of damaged structures or facilities. Compensation may be accomplished by the purchase prior to mining of a noncancellable premium-prepaid insurance policy.

The operator needs to submit a detailed plan of the underground workings. Valley

Camp's mining methodology has evolved from a conventional room and pillar operation into a creative and unique method as a result of mining conditions, MSHA requirements, and other engineering and economic considerations. Currently, the plan has not evolved to adequately depict and describe those changes in underground mining operations and how those changes in mining methods affect the surface subsidence and its impact on structures and renewable resources within the permit area. The detailed plan must include maps and descriptions, as appropriate, of significant features of the underground mine, including the size, configuration, and approximate location of pillars and entries, extraction ratios, measure taken to prevent or minimize subsidence and related damage, areas of full extraction. Upon request of the operator, information submitted with the detailed plan may be held as confidential.

Comments currently in the mining and reclamation plan elude to such a renewable resource survey and subsidence control plan, but no specific plan was found within the mining and reclamation plan. Plans, drawings and the descriptions required in the subsidence control plan need to be provided under this section of the plan or specifically referenced under this section of the plan. The findings and conclusions of other agencies as mentions in the plan should be incorporated into the plan in support of the materials presented in the plan, but, cannot be considered in and of themselves as conclusive proof of compliance with the regulatory requirements.

#### **Deficiencies:**

In accordance with the requirements of this section of the regulations, the operator need to provide the following information:

1. A complete and up to date survey describing the location and disposition of any renewable resources or structures within the permit and adjacent area.
2. A complete and up to date subsidence control plan identifying the areas proposed to be affected by subsidence, mine layout and methods, descriptions of the methods used to prevent, control, minimize and mitigate the affects of subsidence.

#### **Summary:**

Information found in the mining and reclamation plan and the information submitted as part of the proposed amendment to the mining and reclamation plan was found to be deficient. The operator needs to address these deficiencies in both the plan and the amendment. The operator needs to update the current plan as enumerated above and resubmit the amendment for approval by the Division.

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The operator should also be aware that the above changes to the plan should be submitted in a manner that will allow insertion of the material into mining and reclamation plan. Any new maps, appendices, or other changes should be noted in the table of contents for the plan, and references within the text of the plan should be made to reflect such additional information.

It is apparent that much of the problem associated with approval of the proposal is a result of the information found within subsidence section of the mining and reclamation plan. However, it should also be noted that inter-agency review and the changes associated with the interpretation of subsidence requirements and renewable resources has further complicated the approval process of this amendment. The operator should be allowed the opportunity to correct and resubmit information regarding these deficiencies and the Division should encourage a more expedient review and approval process of this information so that normal mining operations at Valley Camp are not curtailed.

cc: R. Summers

Doc. BTEAM\valcamp.mmo