



SALT LAKE AREA OFFICE
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October 13, 1994

Daron Haddock
Utah Division of Oil, Gas & Mining
355 West North Temple
3 Triad Center
Salt Lake City, Utah 84180-1203

RE: White Oak Mining & Construction Co.
Response to Forest Service Comments.

*ACT/007/001 #2
Jaggy from Daron*

Dear Daron:

At the request of Steve Tanner of White Oak Mining and Construction Co., Inc., the following is presented in response to concerns expressed by the Forest Service as summarized in your letter of June 28, 1994.

CONCERN #1. A discussion related to engineering designs so that uniform subsidence is achieved.

Kenneth C. Ko, a rock mechanics expert, analyzed the pillar designs and mine plans employed by White Oak in regards to potential subsidence. His results and conclusions are contained in the report "Subsidence Potential Over Two-Seam Developments" which was submitted to the Division in Section 523 of the 1993 Appendix of the White Oak MRP. It is Mr. Ko's opinion that the current mine plan and pillar design used by White Oak will not cause subsidence under normal conditions. The Subsidence Control Plan identified on Pages O-4 through O-6 of the MRP have been revised to include a discussion of Mr. Ko's report as it relates to this concern.

CONCERN #2. A discussion of past chimney subsidence.

It would appear that a roof failure in rock declines caused the "chimney" subsidence in Boardinghouse Canyon. This type of subsidence would normally have been expected to migrate upward approximately 200 feet as indicated in the Kenneth C. Ko report discussed above. In the case documented in Boardinghouse Canyon, the subsidence surfaced to a height of 289 feet above the roof fall. It is the opinion that the roof fall in question was caused by severe local faulting which may have also compounded the degree of subsidence by breaking up the overburden, weakening the rock, and providing a direct path to the surface. The Subsidence Monitoring Plan presented on Pages O-6 and O-7 of the MRP have been revised to include a discussion of the plug or "chimney" subsidence which occurred in Boardinghouse Canyon.

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CONCERN #3. A commitment that only first mining will occur beneath perennial streams.

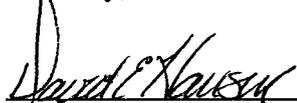
A commitment has been added to Page O-5 of the MRP which states that "White Oak also commits to limit mining to first mining only beneath perennial streams". A statement has also been added to the 250 foot buffer note on Maps R645-301-728.100a and R645-301-728.100b which now states "First mining only within the 250 foot buffer zone over Boardinghouse Creek".

CONCERN #4. Clear delineation on mapping of perennial streams.

Perennial streams discussed in the original 1994 OSM Technical Analysis (including Mud and Eccles Creeks) have been identified on Map R645-301-722.100a. Boardinghouse Creek has also been identified on the map as having perennial flow in September of 1994.

Please call should you have any questions regarding the material contained herein.

Sincerely,



David E. Hansen, Ph.D., P.E.
Project Manager

cc: Steven K. Tanner - White Oak Mining & Construction Co.

APPLICATION FOR PERMIT CHANGE

Title of Change: **RESPONSE TO FOREST SERVICE COMMENTS**
Letter Dated June 28, 1994

Permit Number: **ACT / 007 / 001**

Mine: **White Oak Mine Complex**

Permittee: **White Oak Mining & Const. Co.**

Description, include reason for change and timing required to implement:

Modify MRP to include a clearer discussion related to subsidence and possible explanations of selected subsidence occurrences. Clarification is also made regarding perennial nature of local streams.

- | | | |
|---|--|--|
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 1. Change in the size of the Permit Area? acres <input type="checkbox"/> increase <input type="checkbox"/> decrease. |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 2. Change in the size of the Disturbed Area? acres <input type="checkbox"/> increase <input type="checkbox"/> decrease. |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 3. Will permit change include operations outside the Cumulative Hydrologic Impact Area? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 4. Will permit change include operations in hydrologic basins other than currently approved? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 5. Does permit change result from cancellation, reduction or increase of insurance or reclamation bond? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 6. Does permit change require or include public notice publication? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 7. Permit change as a result of a Violation? Violation # |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 8. Permit change as a result of a Division Order? D.O. # |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 9. Permit change as a result of other laws or regulations? Explain: |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 10. Does permit change require or include ownership, control, right-of-entry, or compliance information? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 11. Does the permit change affect the surface landowner or change the post mining land use? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 12. Does permit change require or include collection and reporting of any baseline information? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 13. Could the permit change have any effect on wildlife or vegetation outside the current disturbed area? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 14. Does permit change require or include soil removal, storage or placement? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 15. Does permit change require or include vegetation monitoring, removal or revegetation activities? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 16. Does permit change require or include construction, modification, or removal of surface facilities? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 17. Does permit change require or include water monitoring, sediment or drainage control measures? |
| <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | 18. Does permit change require or include certified designs, maps, or calculations? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 19. Does permit change require or include underground design or mine sequence and timing? |
| <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | 20. Does permit change require or include subsidence control or monitoring? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 21. Have reclamation costs for bonding been provided or revised for any change in the reclamation plan? |
| <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | 22. Is permit change within 100 feet of a public road or perennial stream or 500 feet of an occupied dwelling? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 23. Is this permit change coal exploration activity <input type="checkbox"/> inside <input type="checkbox"/> outside of the permit area? |

Attach 3 complete copies of proposed permit change as it would be incorporated into the Mining and Reclamation Plan.

I hereby certify that I am a responsible official of the applicant and that the information contained in this application is true and correct to the best of my information and belief in all respects with the laws of Utah in reference to commitment, undertakings, and obligations, herein.

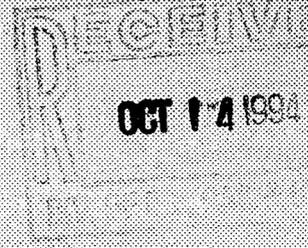
[Signature] 10/11/94
Signed - Name - Position - Date **ENVIRONMENTAL COORDINATOR**

Subscribed and sworn to before me this ___ day of _____, 19__.

Notary Public

My Commission Expires: _____ }
Attest: STATE OF _____ } ss:
COUNTY OF _____ }

Received by Oil, Gas & Mining



ASSIGNED PERMIT CHANGE NUMBER

