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United States Department of the Interior
OFFICE OF SURFACE MINING
Reclamation and Enforcement
BROOKS TOWERS
1020 15TH STREET
DENVER, COLORADO 80202

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DIVISION OF
OIL, GAS & MINING

Mr. Rob Wiley
Environmental Engineer
Price River Coal Company
76 S. Main Street
Helper, UT 84526

ACT/007/004
#2

Dear Mr. Wiley:

This letter details OSM's concerns over the subsidence plan proposed by Price River Coal Company (PRCC) for the Price River Coal Complex Mining and Reclamation Plan. Specifically, PRCC has proposed to mine five seams underneath and immediately adjacent to the Price River, the Denver Rio Grande and Western Railroad and U. S. Highway 6. These five seams are located below the D-seam which has been previously mined.

PRCC has provided a mining plan that would superimpose pillars for the five seams proposed to be mined. Since mining in the D-seam was conducted without a regular pillar design, superimposing pillars between the D-seam and the Kenilworth seam is not operationally feasible. UMC 784.20(a) and 784.20(b)(ii) require a subsidence control plan which incorporates a detailed description of the mining method and the measures to be taken to prevent material damage as a result of subsidence. An example of a subsidence control measure is leaving adequate support pillars of coal. PRCC has described multiple seam mining in previously mined areas and has stated that due to the existence of massive sandstone layers between coal seams, subsidence has not occurred where pillars have been left by the mining operation. PRCC has also stated that proposed mining underneath the Price River will cause no significant subsidence impacts due to the existence of these same sandstone layers.

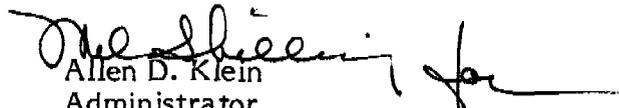
After thorough in-house staff review, OSM has determined that PRCC must substantiate the existence of these sandstone layers under the river and between the coal seams to be mined. Therefore, PRCC must provide the following information:

- (1) Sufficient drill log data that would indicate whether sandstone layers are abundant enough to prevent subsidence impacts;
- (2) A correlation with geologic information from the previous mine operation where subsidence was not a concern and has not caused significant impacts; and,
- (3) The effects of mining under the D-seam and possible pillar deterioration

in the D-seam due to mining in the Kenilworth seam (located immediately below the D-seam).

The subsidence plan for the sub-3 seam appears acceptable to OSM. However, analysis of the potential impacts of mining in the other four seams depends upon the requested information which must be reviewed and approved by OSM. Should you have any questions concerning the contents of this letter, please contact either Dave Maxwell or Walter Swain at (303) 837-3807.

Sincerely yours,


Allen D. Klein
Administrator
Western Technical Center

cc: Bob Hagen - OSM Albuquerque
Keith Kirk - OSM
Tom Tetting - UDOGM ✓
Lynn Kunzler - UDOGM
Deborah Richardson - Consultant