



**CASTLE
GATE**
COAL COMPANY

RECORDED
JAN 13 1988

DIVISION OF
OIL, GAS & MINING

January 12, 1988

Mr. Lowell Braxton
Administrator
Three Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

Dear Mr. Braxton:

Castle Gate Coal Company is experiencing severe methane problems in the mined out gob areas. The Mine Safety and Health Administration (MSHA) will not allow concentrations greater than 2% in these "bleeder" areas of the mine. We are often exceeding this parameter and therefore, MSHA wants Castle Gate to do something about it as soon as possible.

In order to alleviate this safety problem, Castle Gate proposed to drill from the surface vertical degasification wells. Site specific locations have not yet been chosen but they will be located in Bear Canyon.

I have questions which relate to this project which need your opinion:

1. Do we need a permit modification or revision?
2. Which sections of the regulations cover these wells?

If a permit modification or revision is required what questions and commitments does the Division need given the following:

1. The drill sites are already permitted. *(drill sites are in permitted area)*
2. The well will be 8" to 12" in diameter and cased.
3. The well will have a vacuum pump.
4. Roads will be built to drill site locations.
5. If successful, up to 10 holes per year will be drilled.

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6. Locations of holes are selected very quickly depending on gas pockets and the need to vent the gas for safety. Also, hole locations will be selected to minimize road work.

Ideally, I would like to give the Division generic commitments which would cover any degasification well on an as needed basis. This would enable Castle Gate to drill on an as needed basis immediately if safety of the men or the mine is in jeopardy. Castle Gate would make commitments on:

1. site preparation
2. site maintenance
3. well plugging
4. reclamation
5. bonding.

Please give this request a high priority due to the safety problem.

Sincerely,


Richard H. Allison, Jr., P.E.
Project Supervisor

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