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State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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June 1, 2001

Johnny Pappas, Sr. Environmental Engineer
Castle Gate Holding Company
847 Northwest Highway 191
Helper, Utah 84526

Re: Revisions to Subsidence Monitoring, Castle Gate Holding Company, Castle Gate Mine,
C/007/004-AM01A, Outgoing File

Dear Mr. Pappas:

The above-referenced amendment has been reviewed. There is a deficiency that must be adequately addressed prior to approval. A copy of our Technical Analysis is enclosed for your information. In order for us to continue to process your application, please respond to this deficiency by June 15, 2001.

If you have any questions, please call me at (801) 538-5325 or Joe Helfrich at (801) 538-5290.

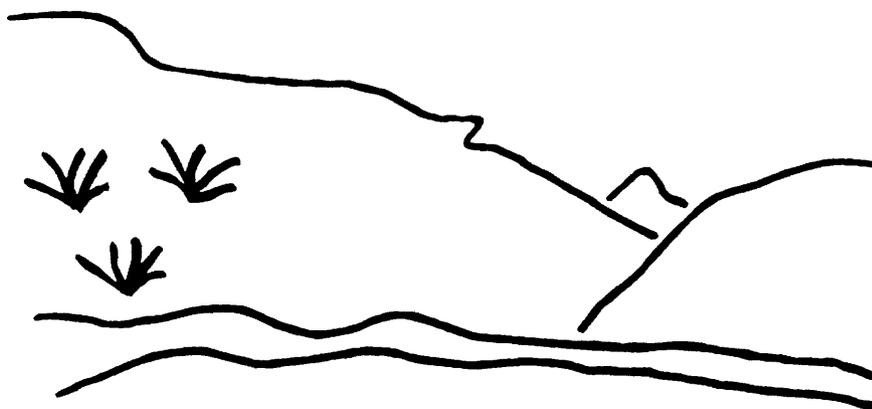
Sincerely,

A handwritten signature in cursive script that reads "Daron R. Haddock".

Daron R. Haddock
Permit Supervisor

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Enclosure:
cc: Price Field Office
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State of Utah



Utah Oil Gas and Mining

Coal Regulatory Program

Castle Gate
Revisions to Subsidence Monitoring
C007/004-AM01A
Technical Analysis
May 15, 2001

INTRODUCTION

TECHNICAL ANALYSIS

INTRODUCTION

On April 11, 2001 the Division received an amendment to revise the subsidence monitoring plan as provided for in Chapter three of the current MRP. Mining operations ceased in the area below the Price River corridor in 1989. A revised subsidence monitoring plan was implemented in 1992 and continued through October of 2000. This application addresses the conclusion of monitoring the control and subsidence monitoring points located in bear and Price Canyons.

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May 15, 2001

INTRODUCTION

ENVIRONMENTAL RESOURCE INFORMATION

ENVIRONMENTAL RESOURCE INFORMATION

Regulatory Reference: Pub. L 95-87 Sections 507(b), 508(a), and 516(b); 30 CFR 783., et. al.

GEOLOGIC RESOURCE INFORMATION

Regulatory Reference: 30 CFR 784.22; R645-301-623, -301-724.

Analysis:

The subsidence monitoring program is provided for in Volume 1 section 3.1-1 of the current MRP. The program includes spacing, level of accuracy, map references and reporting obligations for the monitoring points currently located in Bear and Price Canyons. Additional resource information describing the methods and extent of mining is also provided. The proposal includes changes to Section 3.1-1(1) that will include data from 1992 through October of 2000.

Findings:

The information provided in the application and current MRP is adequate to meet the requirements of this section of the regulations.

MAPS, PLANS, AND CROSS SECTIONS OF RESOURCE INFORMATION

Regulatory Reference: 30 CFR 783.24, 783.25; R645-301-323, -301-411, -301-521, -301-622, -301-722, -301-731.

Analysis:

Monitoring Sampling Location & Mine Workings Maps

Volume 1 section 3.1-1 page 3.1-8 of the current MRP provides reference to the subsidence monitoring map, (exhibit 3-21). The map identifies the locations of the monitoring points identified in the application.

Findings:

The information provided in the application and current MRP is adequate to meet the requirements of this section of the regulations.

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ENVIRONMENTAL RESOURCE INFORMATION

OPERATION PLAN

OPERATION PLAN

SUBSIDENCE CONTROL PLAN

Regulatory Reference: 30 CFR 784.20, 817.121, 817.122; R645-301-521, -301-525, -301-724.

Analysis:

Subsidence control Plan

Subsidence monitoring at the Castle Gate facility has changed several times since 1978. Through 1983 according to the MRP "experience in subsidence monitoring were instructive in indicating that subsidence impacts were not catastrophic; in fact, unnoticeable from a land use stand point, over the majority of the affected surface." In 1992 the permittee revised the subsidence monitoring program to include three control and five monitoring points located in the Bear and Price Canyons. The objective was to monitor subsidence movement within the Price River corridor. Mining had ceased in 1989 and the permittee continued monitoring under the original monitoring scheme until 1992. The Price River Corridor was monitored through October of 2000 and the data has been provided with this proposal. The data provided indicate no appreciable subsidence during that period of time.

Findings:

The information provided in the application and current MRP is adequate to meet the requirements of this section of the regulations.

MAPS, PLANS, AND CROSS SECTIONS OF MINING OPERATIONS

Regulatory Reference: 30 CFR Sec. 784.23; R645-301-512, -301-521, -301-542, -301-632, -301-731, -302-323.

Analysis:

Monitoring Sampling Location & Mine Workings Maps

Volume 1 section 3.1-1 page 3.1-8 of the current MRP provides reference to the subsidence monitoring map, (exhibit 3-21). The map identifies the locations of the control and monitoring points as well as mine workings.

Findings:

The information provided in the application and current MRP is not adequate to meet the requirements of this section of the regulations. Prior to approval the applicant must provide the following in accordance with;

R645-301-512, The applicant needs to provide the proper certification for exhibit 3-21B, labeled "Proposed Subsidence Monitoring Points in Price Canyon."

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