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

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August 10, 2001

Johnny Pappas, Environmental Coordinator
Castle Gate Holding Company
847 North West Hwy 191
Helper, Utah 84526

Re: Conditional Approval of Subsidence monitoring, Castle Gate Holding Co., Castle Gate Mine, C/007/004-AM01A, Outgoing File

Dear Mr. Pappas:

The above-referenced amendment is conditionally approved upon receipt of two additional copies of exhibit 3-21 for incorporation. Please submit these copies by no later than August 24, 2001. Once we receive these copies, a stamped incorporated copy will be returned to you for insertion into your copy of the Mining and Reclamation Plan. A copy of our Technical Analysis is enclosed for your information.

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

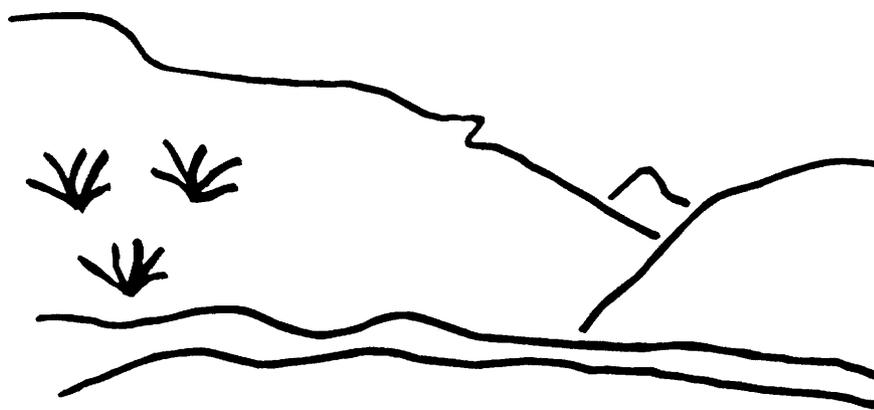
Sincerely,

A handwritten signature in black ink that reads "Daron R. Haddock".

Daron R. Haddock
Permit Supervisor

sd
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
C/007/004-AM01A
Technical Analysis
July 2, 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.

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:

**Mine Workings Maps
Monitoring Sampling Location 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.

Page 4
C/007/004-AM01A
July 2, 2001

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:

Mine workings maps Monitoring and sample location 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 adequate to meet the requirements of this section of the regulations.

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