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State of Utah

DEPARTMENT OF NATURAL RESOURCES
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Division Director

June 29, 1998

TO: File

THRU: Joseph C. Helfrich, Permit Supervisor

FROM: Jim Smith, Reclamation Specialist

Handwritten initials, likely 'JCS', written in black ink.

RE: Gooseberry (West Ridge) Exploration, Canyon Fuel Company, LLC, Skyline Mine,
ACT/007/005-97M, File #2, Carbon County, Utah

SUMMARY

DOG M received a revised Application for Minor Coal Exploration on June 1, 1998, along with a letter describing the changes or additions that had been made. The revision was prepared in response to Technical Analysis (TA) of the original Application, received December 15, 1997. That TA was based on reviews by Mike Suflita and Paul Baker.

On June 19, 1998 I was assigned to replace Mike Suflita on this project because of Mike's work load. On Monday, June 22 Priscilla Burton and I visited the Gooseberry area with Chris Hansen of Canyon Fuel Company and Randy Gainer of Maxim, the consulting firm working with Canyon Fuel Company on this project. Mark Bunnell of Canyon Fuel Company was not able to attend. The purpose of the visit was to evaluate conditions at drill sites located on private land with fee coal, referred to as Category 1 Lands in the Application and on which exploration is administered by DOGM. Of particular interest was site 99-32-1 and the associated stream crossing and road, and the soils at Category 1 sites that are located on ridgetops.

The stream crossing to site 99-32-1 would require a bridge, probably temporary, and crossing the meadow or wetland between the stream and the drillsite would require topsoil salvaging, and reclamation when the work was finished. A potential alternative route to the drillsite was found, a route with a culverted stream crossing that would probably require no disturbance to the stream and along an existing road across the meadow-wetland. Canyon Fuel Company is now pursuing permission from the landowner to use this route.

TECHNICAL ANALYSIS:

OPERATIONAL STANDARDS

Hydrologic Balance

Regulatory Reference R645-202-235

Analysis:

The Operator has committed to establishing at least 3 groundwater monitoring wells to determine the potentiometric surface, with 99-20-1 and 99-29-2 identified as 2 of the borings likely to be developed to measure ground-water levels. Because of the random and discontinuous nature of perched aquifers in the Blackhawk and overlying formations, the wells will be completed to measure the potentiometric surface in the strata immediately beneath the lowest coal seam to be mined. Experience indicates that the lower Blackhawk and adjacent formations are in hydrologic connection, so this should measure the water levels of greatest interest, even though overlying perched systems may be of specific interest to land owners and holders of water rights.

Findings:

Information provided in the Application is considered adequate to meet the requirements of this section.