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

Michael O. Leavitt
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July 14, 2000

Chris Hansen, Environmental Coordinator
Canyon Fuel Company, LLC
HC 35 Box 380
Helper, Utah 84526

Re: Abandonment of Longwall Shields, Canyon Fuel Company, LLC, Skyline Mine,
ACT/007/005, Outgoing File

Dear Mr. Hansen:

The Division has reviewed your plans to abandon longwall shields in the Skyline Mine. It is our understanding that only three shields are being left underground. The enclosed technical memo discusses our analysis of the situation. Your plans for the abandonment of the three longwall shields underground is hereby approved. Thank you for your help in this review.

If you have any questions, please call me.

Sincerely,

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

Daron R. Haddock
Permit Supervisor

sm

Enclosure:

cc: Price Field Office

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July 5, 2000

TO: Internal File

THRU: Daron R. Haddock, Permit Supervisor *DRH*

FROM: Michael Suflita, Reclamation Hydrologist & Project Lead *MS*

RE: Abandonment of Equipment Underground, Canyon Fuel Company, LLC, Skyline Mine, ACT/007/005

SUMMARY:

On May 18, 2000 the Division received a letter from Canyon Fuel Co. indicating their expectation of leaving 28 longwall shields underground. On May 26, 2000 the Division received a letter from the U. S. Forest Service indicating their objection to this plan and indicating they felt that 25 of the shields could be removed. Also, they were, "convinced that it would be unsafe to remove the last three shields." It's appropriate for the Division to review the proposed action and to make a finding with regard to the abandonment of such equipment underground.

TECHNICAL ANALYSIS:

OPERATION PLAN

HYDROLOGIC INFORMATION

Regulatory Reference: R645-300-730

Analysis:

The Utah Coal Rules require that a coal mine Operator demonstrate "....the steps to be taken during coal mining to minimize disturbance to the hydrologic balance within the permit and adjacent areas: to prevent material damage outside the permit area;". The Operator had initially proposed leaving 28 longwall shields underground as part of their mining operation.

TECHNICAL MEMO

The proposal indicated all hazardous materials would be removed from the shields. Specifically, emulsion liquid would be removed and, as many as practical, hoses and electrical controls would also be removed.

The mine is located on U.S. Forest Service property and they are the Surface Management Agency. They objected to leaving all 28 shields underground. They agreed that it would be unsafe to remove three of the shields, and had no objection to leaving them. However, they felt that the other 25 were being left solely to reduce expenses and could be removed. A site visit on June 28, 2000 showed that the 25 shields had been brought to the surface. Chris Hansen, Environmental Coordinator for Canyon Fuel, indicated the shields would be rebuilt for future use in mining. With this situation, only three of the shields remain underground and this analysis is based on that number.

To evaluate the potential impact of leaving the three longwall shields, comparison was made between the shields and other steel materials that must be left underground. Such ferrous materials include steel roof bolts, steel wire ceiling mesh, and steel cans used in support pillars. These materials simply cannot be removed without endangering the lives of miners and are routinely abandoned in all underground coal mines. Considerable tonnage of these materials are left in the mine every year. Since the weight of the three longwall shields is very small in comparison, their impact will be minimal.

All hazardous materials will be removed and the emulsion fluids will be drained from the abandoned shields. Similarly, hoses and electrical components will be removed. The amount of steel involved is relatively small. Given all these factors, it's reasonable to expect that leaving three longwall shields underground will have very little impact on the hydrologic balance and will not result in material damage outside the permit area.

Finding:

The abandonment of three longwall shields underground meets minimum regulatory requirements.

RECOMMENDATION

The abandonment of three longwall shields underground can be approved.