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STATE OF UTAH
NATURAL RESOURCES & ENERGY
Oil, Gas & Mining

Scott M. Matheson, Governor
Temple A. Reynolds, Executive Director
Cleon B. Feight, Division Director

4241 State Office Building • Salt Lake City, UT 84114 • 801-533-5771

February 1, 1983

Mr. Ben Grimes, Environmental Coordinator
Plateau Mining Company
P.O. Drawer PMC
Price, Utah 84501

#10

RE: Subsidence
Monitoring Report
ACT/007/0016
File #10
Carbon County, Utah

Dear Mr. Grimes:

I wish to thank you for forwarding a copy of the 1982 field inspection report on the visual observation of surface effects of subsidence. The Division shares PMC's concern with upholding the commitments made in section 12.4.4, Subsidence Monitoring, of the Mining and Reclamation Plan (MRP). I would offer the following comments on behalf of the Division.

The report seems primarily directed towards concerns of the Forest Service, as indicated by the continued use of itemization 1 - 8. The Division, however, is looking at the subsidence question not only with regard to this minesite, but also as to how it may relate to general mining practices in Utah and the effect subsidence regulations could have on the coal industry. Therefore, little benefit can be derived from the generalized comments expressed in the report received January 17, 1983. Essentially, no quantitative information is presented and no comparative data may be generated. It appears to be a collection of photographs in defense of the opinion that subsidence is not causing any harm. I realize that this may be the prime motivation behind the work, but request that a more thorough presentation be submitted which could prove more beneficial and serve what I view are the intentions of the regulations. Reports of this kind may eventually serve to save quite a bit of money for future operators and should not be treated so lightly.

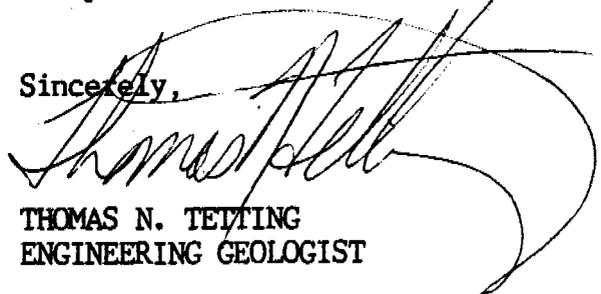
I hope my time and concern in the matter may be appreciated as I would like to offer some suggestions to a receptive company. Commitments in the MRP indicate that the reports will be submitted 60 days after the survey is conducted. This survey was done, I believe, in September of 1982. If quantitative measurements cannot be made from the helicopter perhaps a ground

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team could assist (?). Could a table be compiled of actual surveyed measurements which might indicate the amount of movement perceived (feet, inches, millemeters) at specific monitoring points or the difference from prior measurements? These points might be numbered for clarification on the maps (and future mutual reference). Depths of "slumped" areas and the size of extention cracks could be listed. Although springs are mentioned, flow rates, prior dates of measurements and other considerations that might be more explicit, have not been incorporated into the report. One final comment; reference on page 1 to photo #5 of the report is not clear as they are not numbered. The clarity of duplication is poor enough that they could be considered components of a Rorschach test. Would it be possible to submit the original photos?

I seriously believe that we may work together in the future to further the potential of certain items within the MRP and improve both our understanding of the situation.

Sincerely,

A large, stylized handwritten signature in black ink, appearing to read 'Thomas N. Telling', is written over the typed name and title.

THOMAS N. TELLING
ENGINEERING GEOLOGIST

TNT/lm

cc: Wayne Hedberg, DOGM
Marlene Berg, OSM, Denver