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 File ACT/1007/006
 Cyprus Plateau Mining Corporation
 P.O. Drawer PMC
 Price, Utah 84501
 (801) 637-2875 #2

June 4, 1992

Mr. Lowell Braxton
 State of Utah
 Department of Natural Resources
 Division of Oil, Gas and Mining
 355 West North Temple
 3 Triad Center, Suite 350
 Salt Lake City, Utah 84501-1203

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DIVISION OF
 OIL GAS & MINING

RE: Incidental Boundary Change 92-1 - Lease UTU-64263

Dear Mr. Braxton,

We received a copy of the Manti-La Sal National Forest letter with comments on the incidental boundary change. I will respond to the comments and give them the same number as the Forest Service letter as follows:

1. The exact location of the breakouts is in question at this time because of geologic uncertainties in the area. The eastern boundary fault system of the Pleasant Valley graben runs through the area making the geology of the area somewhat complex. We have not been able in the past to locate drill holes near the area to identify the exact location of the fault, or the coal seam outcrop, if indeed it outcrops.

We have shown the breakouts in the general location at the west side of the lease to maximize the coal reserves and to allow for outcrop access. The breakouts will be developed after a drill hole proposed for this year is completed and the geologic questions can be resolved. We walked and flew the area of the breakouts with Walt Nowak and several other Forest Service personnel on May 18. During the walk and flight, we pointed out the geologic problems, the proposed drill hole and breakout area.

Five entries will be driven north and west toward the breakout area with only three of the entries opened to the outside, one for a fan if needed and two for intake air. The facility will be very similar to the Corner Canyon fan site. Construction of the breakouts and fan will be accomplished from within the mine, no surface access is needed. The general layout of the facility is shown in our Mining and Reclamation Permit document on Map 542.200i (copy attached). Until the drill hole

is completed and the geology is further defined, we cannot pinpoint the exact location of the breakouts.

We ask that the agencies allow us to drive the five entries north and west toward the area of the breakouts during the time the drilling and geologic investigations are being completed. The five entries will take from between one to one and a half years to reach the breakout area. By the time the entries reach the breakout area we will have defined the geology of the area and the exact location of the breakouts. We realize the breakouts require an Environmental Assessment which can only be completed after the exact location of the breakouts is known. This presents no major problem to us since the entries will not reach the breakout area for at least one year. In the event the geology of the area precludes the breakouts, or if any other factor or factors prevent the breakouts from being completed, the five entries will be ended. The five entries are needed for mining the coal lease in any event. We will have lost nothing if the breakouts are not made except the use of the breakouts.

It is our intent to complete the drill hole during the summer of 1992, identify the location of the coal seam, find the location of the outcrop and pinpoint the breakouts shortly thereafter. This schedule should allow time later in the summer or fall to complete the EA. We ask the Forest Service to schedule the EA based on this plan. During the field visit with the Forest Service personnel, we explained this entire program and we thought got their verbal agreement on the concept.

2. Refer to the response to number 1 above.
3. Hydrologic data gathered south of lease UTU-64263 in in-mine monitoring wells and from inflows suggest that mining in lease UTU-64263 will be above any significant water sources and will not generate enough water to create a drainage problem. Mine water will not be discharged at the breakouts. Measures will be taken during abandonment of the mine, if water is encountered in the mine north of the breakouts, to seal the portals so water will not reach the surface.

The only discharge during mining is at the Mudwater portals which is a permitted NPDES discharge point. There is no reason to believe the coal seam drops at the outcrop in Little Park Canyon near the proposed breakouts, on the contrary, there is much conjecture that the breakouts if completed may have to be driven through rock or overburden. No matter what the final

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location of the breakouts, we will insure that there is no chance for drainage of water from the breakouts.

4. Please refer to the responses to numbers 1 and 3 above.
5. As explained to the Forest Service personnel during the May 18 field trip, the air shaft can be completed during the summer of this year. This will provide a much needed safety device for the miners working in the mine on the far side of the graben in lease U-13097. There is no escapeway in the U-13097 lease area inby the graben crossing, the men in this area could be trapped without hope of escape during a disaster. The coal seam does not outcrop in the U-13097 lease area. The Little Park Canyon breakouts, as discussed above, will take from between one to one and a half years to complete; during which time, the air shaft would provide a safety device that could be the difference between life and death.

The air shaft is intended to provide a means to ventilate a safety room constructed in the mine near the western end of the graben crossing and the intersection of the main entries going south in lease U-13097. Miners could retreat to the safety room in the event of a mine disaster and be isolated from the mine atmosphere, where they would have fresh air through the air shaft. The shaft would also provide a means to communicate with the miners and to provide food and water during their rescue.

The last paragraph of the Forest Service letter requests additional information but has no number.

Detailed designs of the breakouts and fan installation will be provided after the breakouts have been pinpointed. The fan, if needed, will be designed during the coming year or two and all details will be provided to the Division and the Forest Service for approval before construction begins. There are no further details available at this time. The limits of surface disturbance will be staked on the ground before the EA is started.

We request the Division and the Forest Service to approve driving the main entries toward the breakout area now. The drill hole proposed near the breakout will provide additional information that will allow further definition of the breakout, at which time, the EA can be completed.

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In summary, the five main entries are needed in any event, whether the breakouts are made or not, so permission to drive them does not constitute approval to break out. The mine has been laid out to avoid the stream in Little Park Canyon and to maximize recovery of the coal reserve in addition to providing the potential to break out for ventilation and to provide an escapeway for miners on the far side of the graben.

If you have additional questions. please contact me at 637-2875.

Respectfully,



Ben Grimes
Sr. Environmental Engineer

cc:
George Morris
Forest Supervisor
Manti-La Sal National Forest
599 West Price River Drive
Price, Utah 84501

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