



State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

Norman H. Bangerter
Governor
Dee C. Hansen
Executive Director
Dianne R. Nielson, Ph.D.
Division Director

355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203
801-538-5340

March 13, 1992

TO: Pamela Grubaugh-Littig, Permit Supervisor

FROM: Jesse Kelley, Reclamation Engineer *JK*

RE: Completeness Review, Castle Valley Ridge Lease Tract Addition, Cyprus-Plateau Mining Company, Star Point Mine, ACT/007/006, Folder #3, Carbon County, Utah

Synopsis

The writer has reviewed the plans for the proposed Castle Valley Ridge Lease Tract Addition for administrative completeness.

Analysis

The writer finds only one issue which the plan does not adequately address.

R645-301-525.230 requires that an operator "[c]orrect any material damage resulting from subsidence caused to surface lands, to the extent technologically and economically feasible, by restoring the land to a condition capable of maintaining the value and reasonably foreseeable uses which it was capable of supporting before the subsidence...." Furthermore, the definition of "Underground Coal Mining and Reclamation Activities" found in R645-100-200 includes such repair of subsidence damage. Thus, since all coal mining and reclamation activities must take place within the permit area, subsidence damage and subsequent repair of that damage must likewise stay within the permit area.

In several places along the western border of the permit area, mining operations are projected to either reach the permit area boundary or approach very close to it. This means that there is a possibility that subsidence might affect the area beyond the bounds of the permit area and thus necessitate repair work outside of the permit area. And as outlined above, the R645 regulations prohibit mining and reclamation activities -- including repair of subsidence damage -- outside of the permit area.

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The operator must do one of three things. He must either 1) extend the permit area boundary to include areas which might be affected by subsidence, 2) demonstrate, by sound engineering analysis, that the proposed mining plan will not bring about subsidence damage outside of the present permit area, or 3) modify the mine plan so that mining will take place far enough from the permit area boundary that subsidence damage will not occur outside of the permit area.

Recommendations

It is recommended that the operator address the issue outlined in the foregoing analysis.

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