

0016

March 18, 1988

TO: Sue Linner, Permit Supervisor  
FROM: David W. Darby, Geologist *DWD*  
RE: Underground Mine Plan Modification, King No. 4 Mine, U. S. Fuel Company, Hiawatha Mine Complex, ACT/007/011-87D, Folder #2, Carbon County, Utah

Synopsis

In accordance with a working agreement between the Bureau of Land Management (BLM), Moab District, and the Division of Oil, Gas and Mining (DOGM), the BLM submitted their approved copy (see December 17, 1987 letter from BLM) of an underground mine change requested by U. S. Fuel Company for their King #4 mine.

U. S. Fuel Company proposed to modify pillar development and extraction in the area between 12th West and 15th West due to engineering difficulties.

After reviewing U.S. Fuel Company's proposal the Division determined that maps in the mine plan did not give sufficient detail to allow a complete review of the proposed amendment. U. S. Fuel Company has made several amendments to their mine plan since their permit was approved. Updated mine maps were needed to completely evaluate the current proposal, so the amendment was tentatively disapproved.

A problem developed as a result of the Division disapproving this proposal, because of the double review that takes place on each mine amendment by BLM and DOGM. The BLM reviews amendments to the mining plan for coal recovery, safety and mine stability, whereas DOGM reviews for reclamation feasibility.

When an operator requests an underground mine change from the BLM, a quick response is needed, because of hazards or insufficient reserves to continue production. The BLM is often current with these situations, because they are involved with the planning phases of the mining sequence and work with the mines on a daily basis. Whereas, DOGM's becomes involved only when new changes are proposed that may or may not effect the potential for reclamation.

The BLM usually receives the amendment first, approves or disapproves the amendment and then notifies DOGM of the amendment. This practice has been standard in the past and has produced few conflicts.

U. S. Fuels became confused upon receiving the DOGM's disapproval letter and contested the double review by separate agencies. Especially since they had proceeded with mining of the amendment area after receiving approval from the BLM.

This situation was discussed in a telephone conversation between Mr. Michael Watson, Manager of Technical Services, Hiawatha Complex, and myself. Mr. Watson explained the current mining situation--that mining had proceeded into the area and would be completed by the time he could supply DOGM with the materials requested. We discussed the current mining conditions, and he (Mr. Watson) verbally addressed DOGM's concerns. He also agreed to submit current maps to aid in future addendum reviews. Since the maps were working drafts and esoteric to the company, it was agreed upon by both parties (Mr. Watson and myself) that the maps would be held as confidential and not be placed in the Mining and Reclamation Plan.

The maps were received by DOGM on February 14, 1988. The materials supplied the necessary information to make an evaluation of the site and supported Mr. Watson statements.

#### Recommendation

This proposal can now be approved by the Division even though it is after the fact.

A protocol should be established to cover emergency mining situations. The Division might want to consider having the mine operators submit emergency mining situations directly to the Division marked "EMERGENCY" or "EXPEDITE" for a quick review response.

dwd

cc. Lowell Braxton  
Wayne Hedberg