

0014

UNITED STATES FUEL COMPANY

P.O. Box A
Hiawatha, Utah 84527

(801) 637-2252
TELEX: 453-123

March 25, 1992

RECEIVED

MAR 27 1992

DIVISION OF
OIL GAS & MINING

Daron Haddock, Permit Supervisor
Division of Oil, Gas and Mining
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

Re: Five Year Permit Renewal, Permit Deficiencies, U. S. Fuel Company, Hiawatha Mines Complex, ACT/007/011.

Dear Daron:

After review of the Division Order and Findings of Permit Deficiency dated March 13, 1992, U. S. Fuel has some questions regarding permit boundaries. According to the deficiency order we are required to justify changes or discrepancies in permit boundaries shown on our maps. In line with this requirement U. S. Fuel requests Division recommendations concerning the following items.

1. Coal rights to a portion of Section 18, T.15 S., R.8 E., were sold to Plateau Mining Company in 1985 (see enclosed letter to the Division dated Jan. 30, 1986). U. S. Fuel wishes to exclude this land from its previously defined permit boundaries. U. S. Fuel is not the mine operator in this area and does not wish to imply responsibility for potential reclamation requirements not related to our operations. Also this could create problems with overlapping permit boundaries.
2. Item No. 2 under R645-301-623 on page 76 of the Permit Renewal Deficiencies states that the permit area needs to be expanded to include all potentially impacted surface areas. Specifically, this applies to areas of potential subsidence along the northern boundary of the permit area (see copy of Exhibit VII-7 enclosed). Our northern boundary is contiguous with Plateau Mining Company's permit area. We will expand our permit area if required, however, Plateau Mining would logically have to do the same and this will again result in overlapping permit boundaries.



Page 2
Daron Haddock
Division of Oil, Gas & Mining
March 25, 1992

Please advise as to the best approach to addressing these boundary changes. It does not appear that a significant permit revision would be necessary. Will a request for an incidental boundary change be sufficient? Also, what problems might arise due to overlapping permit boundaries?

Sincerely,

A handwritten signature in cursive script that reads "Robert Eccli".

Robert Eccli
Senior Engineer

Enclosures: