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JIM

AUG 15 1983

Utah State Office
2040 Administration Building
1745 West 1700 South
Salt Lake City, Utah 84104

August 12, 1983

Memorandum

To: Western Technical Center Manager, OSM
Attn: Mr. Louis Hamm, Project Leader

From: Chief, Branch of Solid Minerals, State Office
BLM, Salt Lake City

Subject: ARCO Coal Company, Beaver Creek Coal Company, Gordon Creek No. 2 Mine, Carbon County, Utah, Mining and Reclamation Plan (MRP)

Mr. Manger's letter dated August 5, 1983, requested that this office submit a list of concerns for each of six permit applications, one of which is the subject plan. We have reviewed the material submitted to this office for this plan and the only remaining concerns we have are addressed in our comment letter dated April 27, 1983. Principally, this effort was to check out these concerns. Our comments follow:

1. In lieu of revising the unapproved resource recovery and protection plan (underground part of the permit application or MRP plan) as required by 30 CFR 211.10(b) effective August 30, 1982, furnish a cross-reference index showing where each specific part of the new 30 CFR 211.10(b) rules, effective August 30, 1982, can be found in the total submission of the permit application package.

2. Furnish a complete coal analysis for the Castlegte "A" seam as required by 30 CFR 211.10(b)(3)(i).

3. Submit a statement to be a part of the underground mining plan that is worded similar to the following: "The BLM is to be involved in and approve any changes in resource recovery or abandonment including portal sealing." We are asking for this statement to emphasize that the BLM is responsible to see that the resource will be fully recovered under existing economics, mining conditions, and available equipment. Basic concepts of multiple seam mining will be difficult if not impossible to apply in the Gordon Creek No. 2 mine because of the intricate pattern of geologic fault systems.

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We have determined that the total permit application received in this office will obtain maximum economic recovery of the resource using current technology and available equipment. When the above three requested items are furnished by the company, we recommend, within our area of authority under the 30 CFR 211.10(b) rules effective August 30, 1982, that the underground mining plan part of the permit application be approved.

Acting

cc: DCG ✓
Beaver Creek Coal Co.
McKean (2)
Piani (0-931)