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cc Wayne  
Pam  
Rick

To Mary

MAR 5 1985

Moab District  
P. O. Box 970  
Moab, Utah 84532

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MAR 7 1985

Memorandum

DIVISION OF OIL  
GAS & MINING

To: Center Administrator, OSM, Denver

Attn: Michael Rosenthal and Walt Swain

From: <sup>ACTING</sup> District Manager, Moab

Subject: Leaving subsidence protection under Beaver Creek, Gordon Creek  
No. 2 Mine, Beaver Creek Coal Company

Beaver Creek Coal Company (BCCC) submitted a proposal to our Price River Resource Area office on February 25, 1985 with copies to OSM and DOGM. BCCC's proposal was initiated because of an OSM stipulation in the August 1984 permit approval. This stipulation requires regulatory authority approval "before secondary mining takes place inside of a 20 degree angle of draw measured from vertical on each bank of Beaver Creek". The proposal provides for leaving adequate subsidence protection while maximizing coal recovery within the 20 degree angle of draw under Beaver Creek.

As noted in BCCC's proposal, coal pillars would be developed on 70 by 40-foot centers leaving pillars 50 by 20 feet based on 20-foot extraction between pillars. The safety factor (ratio of pillar strength to overburden load) calculated by BCCC would be 2.4 which is better than the 2.0 considered safe for most mining purposes. The pillar strength (4,161 psi) is based on a coal strength of 3,200 psi. These values are acceptable to us and are consistent with values being used elsewhere in the area, such as at Valley Camp's Belina No. 1 Mine.

There are 550 or less feet of sandstones and shales over the coal seam under Beaver Creek. The numerous sandstones are generally thickbedded to massive and are resistant to caving over spans of 20 or more feet. At least one massive sandstone is in the range of 30 feet thick. BCCC developed and pulled the pillars in at least three panels beneath the Beaver Creek drainage on either side of the panel presently being considered. Significant subsidence has not occurred in these mined-out panels to date. Subsidence under the proposed panel using the above outlined mining method is not anticipated.

It is our recommendation that timely approval of the BCCC proposal be made. This action is needed before mining advance is halted due to geologic conditions which will initiate retreat mining operations. Without timely approval, coal which would otherwise be recoverable, would remain in the large 50 by 60-foot pillars that should be split to leave the proposed 50 by 20-foot pillars.

If you have any questions, please contact Allen Vance in our Price office at (801) 637-4584.

/s/ Kenneth V. Rhea

cc: SD, Utah (U-921) w/proposal  
DOGM, Salt Lake City, Utah, Attn: Mary Boucek ✓

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