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July 1, 1987

DIVISION OF
OIL, GAS & MINING

Mr. Lowell P. Braxton
Administrator
Utah Division of Oil, Gas & Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1230

Re: Subsidence Monitoring Amendment
Gordon Creek No. 2/7 Mines
ACT/007/016
Carbon County, Utah

Dear Mr. Braxton:

By this letter, Beaver Creek Coal Company is requesting approval of an amendment to the approved subsidence monitoring program for the Gordon Creek No. 2 and 7 Mines. The changes requested for approval are as follows:

- 1) To change the monitoring frequency from "nominal six (6) month intervals" to "nominal one (1) year intervals"; and,
- 2) To allow for monitoring to "be accomplished by either conventional transit survey, or aerial survey, using accepted techniques".

The rationale for our request is based on the following:

- 1) Due to the location and high elevation (Beaver Creek area) of the subsidence points, the stations are inaccessible from late fall through mid-summer. As a result, the "nominal six (6) month intervals" for the survey are generally not possible - the 2 surveys per year usually occur within about three months of one another. Given the difficult access and large number of stations, the surveys are extremely time consuming, and the second survey in the year is considered to be non-productive due to the short time interval from the first;
- 2) Many mine plans in Utah (including larger mines with longwalls) are approved for aerial monitoring, as well as monitoring on a yearly basis, rather than on a bi-annual schedule;
- 3) Past monitoring at these mines (see 1987 Annual Report) has shown little subsidence effect from recent and past mining;

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- 4) Aerial monitoring is a proven, accepted technique for measuring subsidence.

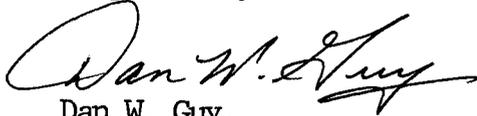
If approved, it would be our intent to contract with a reputable aerial firm to fly our properties, digitize the maps and locations, and measure point elevations (and changes) on a yearly basis. The option of using conventional transit surveys will remain open in the event of unforeseen problems (weather, etc.) with the aerial monitoring, economics, and manpower availability.

I have enclosed four copies of the proposed pages to be changed in the mine plan. Additional copies will be furnished on request. The maps will not change as a result of this amendment.

An annual field survey will continue to be performed on site, and results of this survey, along with the monitoring results and maps will continue to be submitted to the Division with the annual report.

It is our hope this proposal will meet with your approval. If you have any questions, or need any further information, please let me know.

Respectfully,



Dan W. Guy,
Director of Permitting/Compliance

DWG/rs

cc: W.A. Wagener
R.J. Marshall
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