0035

State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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April 11, 1997

TO: File

THRU: Daron Haddock, Permit Supervisor

FROM: Wayne H. Western, Senior Reclamation Specialist

RE: Alkali Tract, Soldier Creek Coal Company, Soldier Canyon Mine, ACT/007/018-97I, File #2, Carbon County, Utah

SUBSIDENCE CONTROL PLAN

Regulatory Reference: 30 CFR Sec. 784.20, 817.121, 817.122; R645-301-521, -301-525, -301-724.

Subsidence Control Plan

Analysis:

In Section 5.25.10, Subsidence Control Plan, the Permittee states that the maximum potential subsidence boundary on Figure (Exhibit) 5.25-1 was calculated by projecting the a 22.5° angle of draw for all coal minable coal in the lease area. The maximum subsidence boundary is based on subsidence that will occur in areas where second mining will occur. The Permittee must change the text in Section 5.25.10 so that it is consistent with the information shown on Exhibit 5.25.1. The Permittee also states:

> Since the approved mine plan does not propose full extraction mining up to the coal lease boundaries, a further evaluation at a 35° angle of draw from the proposed full extraction areas will not extend beyond the subsidence buffer zone as detailed. Any future mine plan modification shall maintain a 35° angle of draw projection within the subsidence suffer zone unless on of the following conditions is satisfied. The Applicant shall demonstrate to the Division's satification that there is no potential for material damage, environmental harm of damage to human health in the subsidence areas. The Division shall accept a lesser degree angle of draw, based on the detailed analysis and engineering evidence submitted by the Applicant.

When the Maximum Subsidence Map, Exhibit 5.25-1 is overlayed on the Exhibit 5.21-5, Rock Canyon Seam Mine Plan and Exhibit 5.21-6, Gilson Seam Mine Plan, mining will obviously occur outside of the maximum subsidence area. The Permittee must clarify the text so that a reader will know that the maximum subsidence buffer zone is based on only those areas where secondary mining will occur.

The Permittee does not show on Exhibit 5.21-5 what parts of the maximum subsidence area are based on a 22.5° angle of draw and those covered by the 35°.

Findings:

Information provided in the proposed amendment is not considered adequate to meet the requirement of this section. Prior to approval, the Permittee must provide the following in accordance with:

> **R645-301-121.200,** the Permittee must present the subsidence control plan in Section 5.25.10 of the amendment is a clear and concise manner. The Permittee must state how they calculated the maximum subsidence buffer zone. The maximum subsidence buffer zone on Exhibit 5.25-1 appears to be based on the projected subsidence for the areas where second mining will occur. The text suggests that they calculated the maximum subsidence buffer zone for all minable areas. The Permittee does not show those areas where the maximum subsidence buffer zone calculations are based on a 22.5° angle of draw and those based on a 35° angle of draw.