

NOV 71

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

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October 9, 1996

TO: Daron Haddock, Permit Supervisor  
FROM: Wayne H. Western, Senior Reclamation Specialist *W H W*  
RE: TA Alkali Tract Amendment, Soldier Creek Coal Company, Soldier Canyon Mine, ACT/007/018, Folder #2, Carbon County, Utah

**SYNOPSIS OF PROPOSAL**

This technical analysis concerns the Alkali Tract Amendment submitted to the Division on September 25, 1996. The amendment concerns the addition of the Alkali Tract to the Soldier Creek Mine. There is no surface disturbance associated with the lease addition. The areas of concern from an engineering stand point include coal recovery and subsidence.

**ANALYSIS**

**Renewable resources survey.**

The Operator identified grazing and recreational uses as renewable resources in the Alkali tract. Private dirt roads in the Alkali tract have the potential for being damaged should subsidence occur.

In the MRP the Operator has committed to mitigating any subsidence related damage. That commitment would apply to all permitted lands.

**Subsidence control plan.**

The Operator has not commented on how subsidence will be monitored in the Alkali tract. In the MRP he states that subsidence monitoring will consist of ground surveys when practical. Once the area becomes too large to be ground surveyed practically aerial, surveys will be used. There is no information on how the Alkali tract will be monitor for subsidence activities. Information on subsidence monitoring must include the location and types of control monuments.



While the Operator does not anticipate subsidence, the Division is concerned by the close proximity of panels to the permit boundaries. The Division wants to monitor subsidence on the panels located next to the permit boundaries. Should subsidence be detected the Operator would be required to mitigate the situation.

#### **Performance standards for subsidence control.**

#### **Findings:**

The Operator has failed to provide information on how subsidence monitoring will be conducted in the Alkali lease area as required by R645-301-525.140.

#### **Deficiencies:**

The Operator failed to meet the requirements of R645-301-525.140 by not providing the Division with information on the subsidence monitoring activities that will occur on the Alkali lease.

### **COAL RECOVERY**

Regulatory Reference: 30 CFR Sec. 817.59; R645-301-522.

#### **Analysis:**

The Operator did not address this section in the PAP. From information outside the PAP the Operator has stated that mining in the ICB will be development mining only. The Division's main concern is that the Operator will conduct mining in a manner that will allow the maximum recovery of the coal in the Alkali Tract.

In a letter dated September 17, 1996, to Mr. Reid Olsen, general manager of Soldier Creek Coal Company, Mr. Mark E. Bailey, area manager for the BLM, stated in a letter to Mr. Reid Olsen, general manager of Soldier Coal Company, that the BLM had approved the revisions to Soldier Creek's resource recovery and protection plan (R2P2). The Division contacted Mr. Barry Grosely, of the BLM, by phone on October 16, 1996. Mr. Grosely has investigated the coal recovery program at the mine. He is satisfied that Soldier Creek is attempting to recover as much coal as possible.

Coal recovery at Soldier Creek will be hampered by burn areas and seam splitting. It is difficult to develop a mine plan that will insure maximum economic recovery until the mining conditions are fully known. Those conditions usually are not known until

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development work take place. During development work the Operator may modify the mining plan due to local mining conditions.

**Findings:**

The Operator met the minimum regulatory requirements for maximum economic coal recovery.

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