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United States Department of the Interior



BUREAU OF LAND MANAGEMENT
Moab District
P. O. Box 970
Moab, Utah 84532

IN REPLY REFER TO:

3482
U-69600
SL-027304
(UT-066)

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MAY 9 1994

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**DIVISION OF
OIL GAS & MINING**

ACT/007/019 #2

Copy Pam

Ms. Pamela Grubaugh-Littig
Utah Coal Regulatory Program
State of Utah
Division of Oil, Gas and Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

Re: Addition of Aberdeen Seam Reserve to Lease UTU-69600, Andalex Resources, Inc.,
Centennial Mine, ACT/007/019

Dear Ms. Grubaugh-Littig:

The Bureau of Land Management (BLM) received from your office a copy of the subject mining plan revision for our review. In addition, Andalex has submitted to our Price River Resource Area office, a copy of a resource recovery and protection plan (R2P2) for the subject revision. Our comments follow:

Andalex has submitted mining plans for the Aberdeen ("A") Seam in the portion of Federal coal lease SL-048442-050115 (Blackhawk Coal Company, lessee) that was previously acquired by Andalex for the Centennial Seam only. This area was given a new lease number of UTU-69600. Andalex is now obtaining the rights to the "A" Seam for this same area.

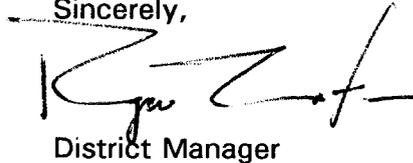
The mining plan submitted by Andalex for this lease addition calls for extending the planned east-west longwall panels further west into the new area to the limits of the minable thickness of coal. The plan uses standard industry panel layouts and follows the projected minable thickness limits of the coal. The southeast section of the lease will be mined by room-and-pillar methods, as the configuration of the minable coal is not conducive to longwall panels.

The R2P2 for the "A" Seam in lease UTU-69600 is an extension of underground mine workings, and no additional surface facilities will be built. Subsidence above the mined-out longwall panels will occur, but to what extent is not predictable. Normally, ground lowering will occur soon after mining is completed. The maximum subsidence will be located in the center of the trough formed by mined-out longwall panels. The amount of subsidence will be a percentage of the actual height of the coal mined, roughly 50 - 70 percent. However, little subsidence has occurred from mining in the Book Cliffs in the past. Also, where Andalex has mined full extraction room-and-pillar panels, there has been no surface disturbance. We anticipate no surface impacts to occur due to subsidence other than ground lowering and some possible surface cracks.

We have determined that the R2P2 for this lease area is complete and technically adequate. The plan is in compliance with the Mineral Leasing Act of 1920, as amended, the regulations at 43 CFR 3480, Federal lease terms and conditions, and will achieve maximum economic recovery of the Federal coal. The area to be mined will not result in any surface impacts. Therefore, we recommend approval of the R2P2 and inclusion of the "A" Seam on Federal coal lease U-69600 to the Centennial Project Mining and Reclamation Plan, conditioned on the finalization of the lease transfer from Blackhawk Coal to Andalex.

If you have any questions, please contact Stephen Falk in our Price Coal Office at (801) 637-4584.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen Falk", written over a horizontal line.

District Manager

cc: UT-065, DM, Moab
UT-921, SD, Utah
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Western Technical Center
Brooks Towers
1020 15th Street
Denver, CO 80202
Andalex Resources
P. O. Box 902
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