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DIVISION OF OIL, GAS AND MINING

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February 14, 1997

To: File

Thru: Daron Haddock, Permit Supervisor

From: James D. Smith, Reclamation Specialist

*DOG*  
*JDS*

Re: Incidental Boundary Change (IBC), Andalex Resources, Centennial Project, ACT/007/019, File 2, Carbon County, Utah.

**SUMMARY**

Federal Lease U-66060 has been expanded by addition of a 160 acre tract identified as Tract 2, located in Sections 31 and 32, T. 12 S., R. 11 E. Andalex Resources has requested an Incidental Boundary Change (IBC) to include the additional tract in the permit area.

The modified coal lease that included the lease to the additional 160 acres was issued by BLM in October 1994. According to BLM documents, included as Appendix W, this addition brings the total acreage in Lease U-66060 to 1094 (1093.32) acres; however, Andalex indicates only 1063 acres. The discrepancy appears to be in the size of the original lease tract rather than in the added lease tract.

The current submittal contains updated versions of Plates 1, 2, 3, 21, 22, 25, 29, and 34 showing the Tract 2 addition. Updated Plates 26, 27, and 28 have not been included with this submittal.

Versions of Plates 2, 3, 26, 27, 28, and 29 that included the 160 acre Tract 2 addition were submitted to DOGM on May 10, 1996 as part of the response to deficiencies identified in a mid-term review done in February 1996 (the Left Fork Fan right-of-way and lease U-69600 had not previously been shown as part the permit area on those plates). Mike Glasson was asked about this additional acreage in a phone conversation on May 23, 1996. His response was that an adjustment to Federal lease UTU-66060 had been granted and Andalex was preparing a request for permit modification. Mr. Glasson indicated the modification request should be delivered to DOGM within a month, I. e., June, 1996. Anticipating a timely submittal of a request for permit modification, DOGM's decision was that the Plates 2, 3, 26, 27, 28, and 29 submitted on May 10 be accepted as sufficient response to the February 1996 mid-term review deficiency and that DOGM take no further action concerning the incorrect depiction of the permit area boundary in the approved MRP. However, the new Plates 2, 3, 26, 27, 28, and 29 were not be inserted into

the MRP at that time because those new plates also showed the anticipated but not yet approved 160 acre Tract 2 addition to the permit area. Probably due to both Andalex' delay in submitting the application for the Tract 2 IBC and DOGM's move from the Triad Center to the DNR Building, those maps submitted in May cannot be located in DOGM's files.

In the cover letter with the IBC submittal, Andalex expresses an urgency to "cross this boundary by one crosscut (roughly 100 feet)". The reasons for the urgency are not given. Speculating from what is shown on the mining plan on Plate 29, the proposed "one crosscut" mining would be two twenty-foot entries separated by sixty-foot pillars advanced towards the north edge of the IBC, probably for exploration.

## **TECHNICAL ANALYSIS**

### ***ENVIRONMENTAL RESOURCE INFORMATION***

Regulatory Reference: Pub. L 95-87 Sections 507(b), 508(a), and 516(b); 30 CFR Sec. 783., et. al.

### **PERMIT AREA**

Regulatory Requirements: 30 CFR Sec. 783.12; R645-301-521.

#### **Analysis:**

Federal Lease U-66060 has been enlarged by 160 acres and Andalex Resources has requested an Incidental Boundary Change (IBC) to include the additional 160 acres in the permit area. The additional lease tract is described on page 22-A and is shown on maps in the IBC submittal. The modified coal lease that included the additional 160 acres was issued by BLM in October 1994. According to the BLM's Bond Rider Acceptance and Modified Coal Lease and the Utica Mutual Insurance Company's Change of Acreage Rider (copies of all three documents are submitted for inclusion in Appendix W) the lease addition brings the total acreage in Lease U-66060 to 1,094 (1093.32) acres ; however, Andalex indicates only 1,063 acres in the lease description on submitted page 22-A. The discrepancy appears to be in the size of the original lease tract rather than in the added lease tract.

Pagination of the submitted pages of lease descriptions does not match that of the current plan. Pages 22, 22-A, and 23 in the IBC submittal should be numbered 21, 21-A, and 22, respectively, to facilitate insertion directly into the currently approved plan.

Also, one line of text at the bottom of submitted page 23 has been left off. The missing line describes the general location of BLM right-of-way UTU-64158 (Left Fork Fan) on page 22 of the current plan.

**Findings:**

Description of lands subject to surface coal mining operations is complete and accurate with the following exceptions:

- R645-301-521:** Acreage in Lease U-66060 is shown as 1063 acres on page 22-A of the IBC submittal rather than 1094 (1093.32) acres.
- R645-301-121.200:** Pagination of the IBC submittal does not match that of the currently approved plan.
- R645-301-521:** The description of the general location of BLM right-of-way UTU-64158 (Left Fork Fan) has been omitted from the bottom of page 23 of the IBC submittal.

**MAPS, PLANS, AND CROSS SECTIONS OF RESOURCE INFORMATION**

Regulatory Reference: 30 CFR Sec. 783.24, 783.25; R645-301-323, -301-411, -301-521, -301-622, -301-722, -301-731.

**Analysis:**

**Affected Area Boundary Maps**

The IBC submittal contains updated versions of Plates 1, 2, 3, 21, 22, 25, 29, and 34 that include Tract 2 of lease U-66060 in the permit area. Tract 2 (160 acres) is in Sections 31 and 32, T. 12 S., R. 11 E. Andalex updated Plates 26, 27, and 28 in May 1996, in response to a deficiency identified in the February 1996 mid-term review, to show the Left Fork Fan right-of-way and lease 69600 (AEP lease) that had previously been approved for inclusion in the permit area. However, those three plates were not inserted into the MRP at that time because they also showed Tract 2, which had not been approved for inclusion in the permit area. Updated Plates 26, 27, and 28 that should show Tract 2 of Lease 66060 (plus the Left Fork Fan right-of-way and lease 69600) as part of the permit area have not been included with this IBC submittal.

**Coal Resource and Geologic Information Maps**

The IBC submittal contains an updated version of Plate 29, including the area of the Tract 2 lease addition, that shows the isopach thickness of the Aberdeen seam, coal crop lines, overburden thickness, and strike and dip. Plates 26, 27, and 28 in the approved, current MRP show similar information for the lower Sunnyside, Centennial, and Gilson seams in areas where

mining has occurred or is projected, generally the south side of the permit area. No seam thicknesses have been previously mapped for the lower Sunnyside, Centennial, and Gilson seams in the Tract 2 area or adjacent acres on Plates 26, 27, and 28, and updated versions of these three maps have not been included with the IBC submittal.

### **Mine Workings Maps**

The IBC submittal contains an updated Plate 29 that shows where the Aberdeen seam has been mined up through 1994 and where mining is planned, which includes mining in the Tract 2 lease addition. Updated Plates 26, 27, and 28, which should show present extent of mined areas and mining projections for the lower Sunnyside, Centennial, and Gilson seams respectively, have not been included with this submittal. Based on current knowledge of coal thickness and minability in these three seams there is no anticipation that they will be mined within the Tract 2 addition.

### **Permit Area Boundary Maps**

The IBC submittal contains updated versions of Plates 1, 2, 3, 21, 22, 25, 29, and 34 that show the permit boundary to include Tract 2 of lease U-66060. Tract 2 (160 acres) is in Sections 31 and 32, T. 12 S., R. 11 E.

In response to a deficiency identified in the February 1996 mid-term review, Andalex updated Plates 26, 27, and 28 in May 1996 to show the Left Fork Fan right-of-way and lease 69600 (AEP lease) that had previously been approved for inclusion in the permit area. However, those three plates were not inserted into the MRP at that time because they also showed Tract 2, which had not been approved for inclusion in the permit. Updated Plates 26, 27, and 28 that should show Tract 2 of Lease 66060 (plus the Left Fork Fan right-of-way and lease 69600) as part of the permit area have not been included with this IBC submittal.

### **Surface And Subsurface Ownership Maps**

Surface Ownership Map (Plate 2) and Mineral Ownership Map (Plate 3) have been updated to show the area included in the IBC submittal.

### **Findings:**

This portion of the mining and reclamation plan is complete and accurate with the following exception:

**R645-301-521:** Updated versions of Plates 26, 27, and 28, which should show the IBC area (plus the Left Fork Fan right-of-way and lease U-69600) as part of the permit area (along with coal seam and overburden

thickness and previously mined areas as applicable) have not been included in the IBC submittal.

***OPERATION PLAN***

**MAPS, PLANS, AND CROSS SECTIONS OF MINING OPERATIONS**

Regulatory Reference: 30 CFR Sec. 784.23; R645-301-512, -301-521, -301-542, -301-632, -301-731, -302-323.

**Analysis:**

Same as for Resources Section.

**Findings:**

Same as for Resources Section.

***RECLAMATION PLAN***

**MAPS, PLANS, AND CROSS SECTIONS OF RECLAMATION OPERATIONS**

Regulatory Reference: 30 CFR Sec. 784.23; R645-301-323, -301-512, -301-521, -301-542, -301-632, -301-731.

**Analysis:**

Same as for Resources Section.

**Findings:**

Same as for Resources Section.

***CUMULATIVE HYDROLOGIC IMPACT ASSESSMENT***

Regulatory Reference: 30 CFR Sec. 784.14, UCA R645-301-729

**Analysis:**

A Cumulative Hydrologic Impact Assessment (CHIA) was prepared December 4, 1990 and re-evaluated on April 20, 1993 for the addition of lease UTU-66066 (the "AEP" lease) to the permit. The proposed Tract 2 addition is within the Cumulative Impact Area (CIA) of that original 1990 CHIA. The probable cumulative impacts of all anticipated coal mining and reclamation operations on the hydrologic balance in the cumulative impact area has been assessed and it has been determined that the proposed operation has been designed to prevent material damage to the hydrologic balance outside the proposed permit area.

**Finding:**

The Division has determined that the proposed operation has been designed to prevent material damage to the hydrologic balance outside the proposed permit area.