

0039

FILE ACT, 15/004 #2 TO Mary

copy Tom M.
Mary

3400
SL-064903
(U-921)

January 10, 1984

Memorandum

To: Utah Senior Project Manager, CSM, Denver

JIM

JAN 13 1984

Attention: Louis Hamm

From: Chief, Mining Law and Solid Minerals, BIM, SO, Salt Lake City, UT

Subject: ARCO Coal Company, Beaver Creek Coal Company, Huntington Canyon No. 4 Mine, Mining and Reclamation Plan (MRP)

The pages transmitted from your office on December 27, 1983, were duplicates of a part of the information transmitted with your letter dated December 5, 1983. They were responses to the UDCM deficiency letter of 8-1-83.

Accordingly, we have no comments.

Jackson W. Moffitt

cc: ARCO
DOGM

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JAN 13 1984

DIVISION OF
OIL, GAS & MINING

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Attention: Louis Hamm

From: Chief, Mining Law and Solid Minerals, BLM, SO, Salt Lake City, UT

Subject: ARCO Coal Company, Beaver Creek Coal Company, Huntington Canyon No. 4 Mine, Emery County, Utah, Mining and Reclamation Plan (MRP)

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The two-volume subject plan, which includes the apparent completeness review responses, was transmitted with your letter dated July 12, 1983. This amendment has been reviewed for completeness and technical adequacy. We were also requested to determine if the coal recovery procedures proposed conflicted with future recovery of coal resources. This submittal is apparently a complete resubmittal of the two-volume MRP reviewed by this office and commented on by memorandums dated May 4, 1981, July 8, 1981, December 23, 1981, and June 4, 1982. The following are our comments:

1. Our earlier regulations 30 CFR Part 211 have been recodified as 43 CFR 3400. 43 CFR 3482.1(b) in part, requires that MRP submittals not approved as of August 30, 1982, be revised to comply with the new rules. The subject MRP is still pending approval. By memorandum dated October 12, 1982 (copy attached), we notified the company of this requirement and suggested a way to minimize their efforts to revise the underground mining part of the current permit application package. Principally, we requested that the company provide this office with a cross-reference between the new rules and their current permit application and submit any additional technical information that may be required. To assist the review and preparation of the cross-reference, we attached a checklist used by this office for reviewing "Resource Recovery and Protection Plans" (revised checklist attached).

2. 43 CFR 3482.1(c)(4)(v)(A) requires planned sequence of mining by year for the first 5 years, thereafter in 5-year increments for the remainder of mine life. The company has only sequenced the first 5 years.

3. 43 CFR 3482.1(c)(3)(i) requires sufficient coal analysis to determine coal quality. We were not able to find an analysis showing volatile matter and fixed carbon content.