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STATE OF UTAH
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file 001015/004 #2

October 16, 1987

TO: John Whitehead, Permit Supervisor

FROM: Richard V. Smith, Geologist *RVS*

RE: Request to Amend Subsidence Control Plan, Beaver Creek Coal Company, Huntington #4 Mine, INA/015/004, Folder #2, Emery County, Utah

Synopsis of Proposal

The operator requests that all subsidence monitoring be suspended at the Huntington #4 Mine. The operator states that they have been informed by the USFS that vertical movement data cannot be, at this time, derived from aerial photography collected since 1979. Moreover, the USFS has cancelled the 1987 aerial photography program.

Analysis

The operator is committed, in the approved PAP, to providing an annual subsidence monitoring report by January 31 of each year (Section 3.4.8.4, page 3-55). The subsidence report will include vertical movement information derived from the annual aerial photography and results of the bi-annual surface inspection.

Aerial photography collected since 1979 may be utilized to derive vertical movement when problems related to locating subsidence monuments have been resolved.

Recommendations

1. Approve discontinuance of the aerial photography aspects, including submittal of annual data, of the subsidence monitoring plan until the USFS resolves problems with locating monuments. Upon correction of the monument location problem, require the operator to commit to derive and submit vertical movement data from preceeding (1980-1986) aerial photography surveys.

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2. Approve discontinuance of the bi-annual surface inspections.
3. Require the operator to commit to:
 - (a) Acquiring additional aerial photography, in cooperation with the USFS, if vertical movement data from preceding (1980-1986) aerial surveys indicate substantial subsidence. Moreover, commit to providing attendant vertical movement data.
 - (b) Acquiring, in cooperation with the USFS, one suite of aerial photography and providing attendant vertical movement data prior to bond release.
 - (c) Conducting an annual surface inspection to identify material damage to the surface (i.e., slope failure, subsidence cracks). Commit to annually providing the results of the surface inspection.

djh

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