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UNITED STATES
DEPARTMENT OF THE INTERIOR

GEOLOGICAL SURVEY
Office of the District Mining Supervisor
Conservation Division
2040 Administration Building
1745 West 1700 South
Salt Lake City, Utah 84104-3885

JIM

DEC 10 1981

November 27, 1981

Memorandum

To: Regional Director, OSM, Denver

From: District Mining Supervisor, OSGS-CD,
Salt Lake City

Subject: Natomas Minerals of Utah, Inc., Natomas Trail
Mountain Coal Company, Trail Mountain Mine, Emery
County, Utah, Mining and Reclamation Plan

The subject two-volume plan forwarded from your office was received November 2, 1981. The insertion and replacement material for the same plan forwarded from your office was received November 16, 1981. All of this material has been reviewed for completeness and technical adequacy and for compliance with Federal Regulations 30 CFR 211.10(c) dated May 17, 1976, as amended August 22, 1978, and for compliance to the comments in our letter dated June 26, 1981. The June 26, 1981, letter is the review of the one-volume mining and reclamation plan of action which was forwarded by the State Division of Oil, Gas, and Mining (DOG&M) and received in this office on April 27, 1981. Even though we were requested by DOG&M to review the document for apparent completeness in accordance with the Act there were at least five separate statements in the material indicating additional information to be submitted at later dates.

We were informed after our review that the one-volume mining and reclamation plan of action was not meant to be the official submittal of the required mining and reclamation plan. The following are our comments on the subject material received from your office November 2, and 16, 1981:

1. The format of this review will follow the suggested alternative approach listed on pages 2 and 3 of our review letter dated June 26, 1981: (Information referred to will be from the subject submittal.)

a. The requested cross-reference index starts on page 1-11. It is submitted as requested.

b. Requested structural features of the coal are satisfactorily explained in chapters 6 and 12, principally on page 6-9.

c. Requested estimated recoverable reserves are added on pages 3-17A and 6-13.

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DIVISION OF
OIL, GAS & MINING

D. (1)-211.10(c)(6)(ii)--The requested method of mining and sequence are satisfactorily described on page 3-13 and shown on figure 3-6.

D. (2)-211.10(c)(6)(iv)--Requested engineering techniques are adequately described in chapter III.

D. (3)-211.10(c)(6)(v)--The requested list of all major mining equipment is satisfactorily listed on page 3-20.

D. (4)-211.10(c)(6)(vii)--The cross-reference index shows that this regulation is addressed in section 3.5. The GS has stated that this regulation can be complied with by a narrative statement including only those items related to resource recovery. Section 3.5 is the reclamation plan and doesn't refer to 30 CFR 211.4 and 211.40 as such even though most requirements involve reclamation.

D. (5)-211.10(c)(6)(viii)--The cross-reference index refers to this regulation in section 2.6 which states compliance is included in chapter 3. The GS was specifically requesting acres affected by mining. Even though acres affected by mining (potential) are not given relative to a time period, figures 3-6 and 3-8 show all the areas that will be mined. This will satisfy the GS. They do, however, state on page 3-55 that a total of 773 acres may be affected by subsidence.

D. (6)-211.10(c)(6)(x)--Required data submitted under this regulation is satisfactory with the narrative relative to recovery on page 3-17 through page 3-19 and the inclusion of figures 6-5 (overburden) 6-6 (Stratigraphic section) and 6-7 (coal isopach).

D. (7)-211.10(c)(6)(xiv)--Section 3.3.2.1 on page 3-17 is adequate for our request for a plan to protect oil, gas, and water wells.

D. (8)-211.10(c)(6)(xv)--Our request for justification for not recovering any coal deposit . . . is satisfactorily covered in chapter 3.

E. 211.10(c)(6)(xi)--This regulation was cross-referenced with sections 3.5.3.1 and 7.1.6. Involvement of USGS-CD in abandonment was not addressed.

F. 211.10(c)(6)(xii)--The company doesn't have any logs to submit.

G. 211.10(c)(7)(iii)--Figures 3-5, 3-6, 3-8, 3-10, and 3-12 provide sufficient data to comply with our request (location of all workings.)

H. 211.10(c)(7)(v)--The requested Roof Control and Ventilation plans are included (begin on page 3-73). The Roof Control plan has copies of the approval letters from the Mine Safety and Health Administration. The approval letter or letters for the ventilation plan is missing.

We have determined that the total submission is adequate for the requirements of 30 CFR 211.10(c) and for our administration of the associated Federal coal lease if the following stipulations become a part of the final approval:

GS Stipulation No. 1

"The operator will comply with the parts of 30 CFR 211.4 and 211.40 that are related to resource recovery."

GS Stipulation No. 2

"The company will involve USGS-CD in all situations involving recovery or abandonment of the resources. Normally, each problem will involve a joint (management and GS) site specific inspection, a joint review, followed by a formal submittal of a plan for approval by the USGS-CD."

GS Stipulation No. 3

"The complete Roof Control and the Ventilation, Methane, and Dust Control plans approved by Mine Safety and Health Administration (MSHA) are an integral part of the mining and reclamation plans and must be compatible. As these plans are updated and/or changed and approved by MSHA, the company will submit complete copies of the updated and/or changed parts as addendums or modifications to the formal mining and reclamation plan. The current submittal needs an approval letter for the included Ventilation plan."

Jackson W. Hoffitt

cc: Denver
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