



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

IN REPLY REFER TO:

U-062996

File ACT/015/009
~~Copy to Lee 2/6/81~~
Jim

June 26, 1981

Memorandum

To: Regional Director, OSM, Denver

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

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

By letter dated April 27, 1981, the Utah Division of Oil, Gas, and Mining (DOG&M) forwarded to this office a one-volume submittal of the subject mining and reclamation plan permit application. As instructed in the DOG&M letter, we are to review the plan and submit our comments to OSM. The 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. The following are our comments:

1. A mining and reclamation plan submission under the permanent program (OSM) is to be a complete plan including mining plans approved by USGS-CD and the complete Roof Control and Ventilation System and Methane and Dust Control Plans approved by the Mine Safety and Health Administration (MSHA). The complete submission will eventually be approved by the Secretary and will replace all previous approvals. For us to consider this as a complete plan it should be supplemented with a complete copy of the original 211 plan approval (May 17, 1976, plan) and all mine plan modifications presently effective and a copy of the latest roof control and ventilation plans including mine maps approved by MSHA.

The subject submittal has been assembled for a Utah State permit application in accordance with the State guidelines for organizational format and content. The submittee did not directly address the 30 CFR 211.10 (c) requirements nor cross-reference the information and data that would be repetitive in both formats. We require that Natomas provide a cross-reference index that designates the sections and pages or maps which contain the 30 CFR 211.10 (c) requirements. The format for this cross-reference index should follow a six-page outline that we are presently using to review mine plan submittals. A copy of this review checklist will be attached to Trail Mountain Coal Company's copy of this letter.

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DIVISION OF
OIL, GAS & MINING

Apparently this submittal is not the final plan as indicated by the following statements:

- (1) Chapter III, section 3.2—"The mining and geological descriptions will be completed on or before July 1, 1981, for permit compilation."
- (2) Chapter III, Table 3-1--Outline of Mine Plan Development Format. All of section 3.3 to be submitted later. Section 3.4.8, page 3-3, "Subsidence control plan will be developed in conjunction with mining plan."
- (3) Chapter III, section 3.2 (4)--"mining plans . . . will be integrated into the subsidence program."
- (4) Chapter VI, page 6-7--"A more detailed description will be filed in the final mine permit application."
- (5) Chapter XII, section 12.1--". . . Results of these analysis will be prepared and presented in the final mine permit application." A complete plan will require this information.

An alternative approach to bring this submittal into compliance relative to the USGS-CD responsibilities would be to supplement the current plan with the following specific information and data:

- A. Furnish a cross-reference index as described above relative to the 30 CFR 211.10 (c) regulations and using a format similar to the attached checklist. (Natomas copy only)
- B. Federal regulation 30 CFR 211.10 (c)(2) requires, in part, a description of the structural features of the coal.
- C. The estimated recoverable reserves must be submitted as required by 30 CFR 211.10 (c)(6)(i).
- D. To update this incomplete submittal the following 30 CFR 211.10 (c) regulations must be addressed in narrative and where required provide appropriate information such as maps, data, etc.
 - (1) 211.10 (c)(6)(ii)--The method of mining, including mining sequence . . . etc.
 - (2) 211.10 (c)(6)(iv)--The engineering techniques . . . etc.
 - (3) 211.10 (c)(6)(v)--A list of all major equipment.
 - (4) 211.10 (c)(6)(vii)--. . . plans to comply with . . . 211.4 & 211.40
 - (5) 211.10 (c)(6)(viii)--relative to schedules and acres affected by mining.

(6) 211.10 (c)(6)(x)—The measures for ensuring the maximum practicable recovery . . . sufficient data . . . in the form of narrative, cross-sections, coal thickness isopachs, overburden isopachs . . . etc.

(7) 211.10 (c)(6)(xiv)—Plans for protecting oil, gas, and water wells . . . etc.

(8) 211.10 (c)(6)(xv)—Justification for not recovering any coal deposit

- E. Regulation 30 CFR 211.10 (c)(6)(xi) requires the method of abandonment of coal mine operations. USGS involvement is necessary on Federal leases or areas that may affect Federal coal. This involvement must be addressed in the narrative.
- F. Furnish complete logs of all exploration drill holes, both surface and underground in Federal leases, that have not been submitted previously to the District Mining Supervisor, USGS as required by 30 CFR 211.10 (c)(6)(xii).
- G. As required by 30 CFR 211.10 (c)(7)(iii) a map, preferably the working mine map, should show the location and extent of known surface and underground workings on or near the property. There should be cross-sections and plan views of the land to be affected. . . etc.
- H. Regulation 30 CFR 211.10 (c)(7)(v) requires as part of the mining and reclamation plan the inclusion of the latest approved (by MSHA) Roof Control and Ventilation System and Methane and Dust Control Plans, including all mine maps submitted to MSHA with the plans. This regulation also requires that USGS be furnished copies of subsidence plans and monitoring information required by 30 CFR 784.20.

Some parts of this submittal are adequate for the 30 CFR 211.10 (c) format. Repeating these items is not required, but each part must be identified and included in the cross-reference index as described above.

Jackson W. Moffitt

- cc: Denver
 - Trippe
 - Skinner
 - LOGW ✓
 - Jim Smith
 - Trail Mountain Coal Co. w/attachment
 - Hernandez (1)
 - McKean (2)