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Beaver Creek Coal Company

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ACT/015/009-88A
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January 28, 1988

DIVISION OF
OIL, GAS & MINING

Mr. Lowell P. Braxton
Administrator
Utah Division of Oil, Gas and Mining
355 West North Temple
3 Triad Center Suite 350
Salt Lake City, Utah 84180-1203

FILE COPY

RE: Amendment on Second Mining
Trail Mountain No.9 Mine
ACT/015/009
Emery County, Utah

Dear Mr. Braxton:

Herein submitted are 8 copies of a proposed amendment on second mining east of the escarpment in Cottonwood Canyon.

The original plans for this mine stated that second mining would not occur east of this escarpment, for protection of the canyon walls; however, these plans were devised prior to any geotechnical studies on this mine. In 1985, a study was performed on the area in question, wherein it was determined that limited second mining could occur east of the escarpment with no danger of subsidence or damage to the canyon. The possibility of performing second mining was also discussed with Mr. John Blake, the Utah State Minerals Resource Specialist, and he agreed that second mining should be performed where feasible to maximize coal recovery on the State Land. He also discussed this with Mr. John Whitehead at this time and Mr. Whitehead indicated the Division's willingness to consider an amendment to the mine plan to allow for second mining.

The geotechnical study indicated that a 1.5 safety factor could be maintained with a pillar size of 40' x 60' up to an overburden of 685 feet, allowing for 63% recovery, and a 47' x 60' pillar should be left up to an overburden of 1330 feet, allowing for 56% recovery.

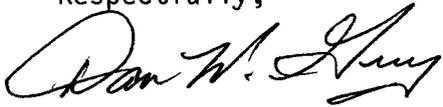
The geotechnical study and the letter from Mr. Blake are enclosed as Appendix 12-1, and should be added to Chapter 12 of the Tract I M.R.P..

In addition, I have amended 4 pages of the M.R.P. to help clarify the question of limited second mining. Pages 3-14, 3-19, and 3-19A should replace corresponding pages in Chapter 3 of the Tract I M.R.P.. Page 3 should replace the corresponding page 3 in Chapter 3 of the Tract II M.R.P.

It is our hope this proposal will meet with your early approval. It is our plan to begin retreat from the Main South Entries toward the end of February, 1988. This retreat is much earlier than previously planned; however, recent limitations on pillaring in our 6th West Section imposed by M.S.H.A. and geologic conditions have shortened the life of this section.

If you have any questions, or need any further information, please let me know.

Respectfully,



Dan W. Guy
Manager Permitting/Compliance

cc: Dan Meadors
Joe Fielder
Johnny Coffey
Allen Childs
Jay Marshall
File