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BEAVER CREEK Coal Company

Post Office Box 1378
Price, Utah 84501
Telephone 801 637-5050



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November 15, 1990

**DIVISION OF
OIL, GAS & MINING**

Pamela Grubaugh-Littig
Permit Supervisor
Utah Division of Oil, Gas & Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

Re: Initial Completeness Review
Federal Lease Application
Trail Mountain No. 9 Mine
ACT/015/009, Folder #2
Emery County, Utah

Dear Ms. Littig:

Enclosed are 14 copies of the Beaver Creek Coal Co. response to the Initial Completeness Review on the Trail Mountain No. 9 Mine Lease Permit Application.

All pages and Plates are numbered and should replace corresponding members in the Lease Permit Application Plan. Also enclosed is a checklist to facilitate the review.

This response includes the U.S. Forest Service comments sent to the Division on Oct. 5, 1990. Response to the B.L.M. comments have been forwarded directly to their Price office per their request.

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

Respectfully,

Dan W. Guy
Mgr. Permitting/Compliance

cc: Johnny Coffey
Dave Arnolds
File

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Post Office Box 1378
Price, Utah 84501
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11/19/90

Pamela Grubaugh-Littig
Permit Supervisor
Utah Division of Oil, Gas & Mining
355 West North Temple
3 Triad Center, Suite 350
S.L.C., Utah 84180-1203

Re: U.S.F.S. Comments
Lease Permit Application
Trail Mountain No. 9 Mine
ACT/015/009
Emery County, Utah

Dear Ms. Littig:

This letter is the Beaver Creek Coal Company response to the U.S. Forest Service concerns on the Trail Mountain Lease Permit Application, expressed in their letter to Lowell Braxton on Oct. 5, 1990.

All items that were to be addressed in the permit were submitted along with our I.C.R. response on Nov. 15, 1990; however, some of their concerns are being addressed in this letter without submittal of additional permit information. Each of the U.S.F.S. comments are addressed in the order of their letter:

- (1) **Chapter 3 Operating Plan** - The overall mining plan (Figure 3-6) has been resubmitted to the B.L.M. for review and approval under the Resource Recovery and Protection Plan. Upon their approval, a more detailed mining plan will be submitted for the P.A.P..
- (2) **Section 3.3.2.2 - Protection of Surface Structures and Streams** - This comment is addressed in revised Section 3.3.2.2 of the Lease Permit Application.
- (3) **Section 4.4.2 - Mine Plan Area Land Use** - This comment is addressed in Section 4.4.2 of the Lease Permit Application.
- (4) **Section 6.5.1 - Exploration land Drilling** - Figure No. 6-1 has been corrected to 6-4.

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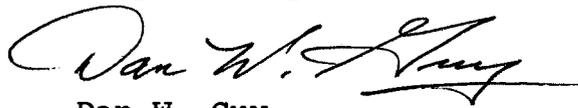
- (5) **Section 6.5.5.1 - Reserve Calculations** - The coal isopach map has been submitted to the B.L.M. for evaluation under the R_2 P_2 requirements. This map contains proprietary information, and will not be submitted at this time, except as directed by the Division.
- (6) **Section 6.7.2 - Local Formations Structure** - This comment is addressed in Section 6.7.2 of the Lease Permit Application.
- (7) **Chapter 7 - Hydrology** - This comment is addressed in Section 7.5 of the Lease Permit Application.
- (8) **Section 7.1.3.1 - Regional Groundwater Hydrology** - An additional spring/seep survey will be conducted in 1991, as stated in Section 7.1.5.
- (9) **Section 7.1.6.1 - Alternative Water Supply** - This comment is addressed in Section 7.1.6.1 of the Lease Permit Application.
- (10) **Section 7.1.5 - Effects of Mining on the Groundwater Balance** - This comment is addressed in Sections 6.7.2 and 7.1.5 of the Lease Permit Application.
- (11) **Section 7.2 - Surface Water Hydrology** - This comment is addressed in Section 7.1.5 of the Lease Permit Application.
- (12) **Chapter 8 - Soil Resources** - Not required.
- (13) **Chapter 9 - Vegetation Resources** - This comment is addressed in Section 9.1 of the Lease Permit Application.
- (14) **Chapter 10 - Fish and Wildlife Resources** - This comment is addressed on new Figure 10-4 of the Lease Permit Application.
- (15) **Section 12.4.2 - Subsidence Experience Over Coal Mines** - The 15° angle of draw is an estimate based on extraction ratios and geologic conditions in this area. Subsidence monitoring has not proven or disproven this estimate; however, if future measurements should indicate the angle of draw to be greater, it will be changed.
- (16) **Section 12.4.3 - Subsidence Effects and Control** - This comment is addressed in Section 12.4.3 of the Lease Permit Application.

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- (17) **Section 12.4.4 - Subsidence Monitoring** - Beaver Creek Coal Company maintains the position that the proposed subsidence monitoring plan is adequate and meets the regulatory requirements; therefore, no change is submitted at this time.

It is our hope this letter will help remove the U.S.F.S. concerns. If you have any questions, or need any further information, please let me know.

Respectfully,



Dan W. Guy,
Mgr. Permitting/Compliance

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