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OCT 31 1990

DIVISION OF  
OIL, GAS & MINING

Moab District  
P.O. Box 970  
Moab, Utah 84532

3843  
(U-062906)  
(U-64375)  
(U-655)

*Plead copy to  
D.M. Jesse:  
Dave Darby  
File ACT/015/009 #2*

Mr. R. G. Pick, President  
Beaver Creek Coal Company  
P.O. Box 1378  
Price, Utah 84501

OCT 29 1990

Dear Mr. Pick:

We have received a copy of Beaver Creek Coal Company's Permit Application Package (PAP) for the addition of the Trail Mountain Federal coal lease (U-64375) to the No. 9 mine permit area from Utah Division of Oil, Gas and Mining (UDOGM). The Bureau of Land Management (BLM) has the responsibility to review and recommend approval of the resource recovery and protection plan for completeness in accordance with the Mineral Leasing Act of 1920, with regulations codified at 43 CFR 3482. The primary purpose of this review is to ensure maximum economic recovery (MER) of leased Federal coal. Based on our review, we have found deficiencies listed as follows:

1. Isopach maps for each coal bed to be mined and the overburden and interburden isopach maps must be submitted for the new lease area as per 43 CFR 3482.1(c)(4)(ii). Isopach maps in previous PAP submittals do not address the new lease area. It would be helpful if you submitted isopach maps for the whole permit area so that we do not have separate maps for the new and old permit areas.
2. The general layout map, as required by 43 CFR 3482.1(c)(4)(v) and submitted as Figure 3-6 in the PAP must show mining sequence by year for the first five years and thereafter in 5-year increments for the life of the property. The map should be in sufficient detail to determine development panel and barrier sizes. Areas where mining is not anticipated must be justified either on the map or in the narrative.
3. The resource recovery and protection plan (R2P2) must show a sketch of typical main development and panel development entries showing dimensions. Previous R2P2s submitted can be used as a cross-reference if the development dimensions have not changed.
4. A sketch of typical panel and pillar recovery must be included as per 43 CFR 3482.1(c)(4)(v)(E). Again, cross-referencing is adequate if pillar recovery plans have not changed. A justification of why pillars are unrecovered is also needed.

5. An updated copy of the current roof control and ventilation plan submitted to Mine Safety and Health Administration needs to be made part of the plan.

6. Reserve figures, as shown on page 3-4a of the PAP show only in-place tons and recoverable tons and exclude minable tons. Consult the definitions of these terms found at 43 CFR 3480.0-5(a) so that figures relate to the definitions. Also, recoverable reserves for lease U-49332 are much lower than the figures previously used to determine commercial quantities. These figures need to be justified and addressed.

Please submit four copies of the changes necessary directly to the Coal Office in Price. All proprietary information should be marked and will be kept as such and not made part of the public information contained in the PAP. If we can be of assistance or answer any questions, please feel free to call Stephen Falk at 537-4504.

Sincerely yours,

**/s/ WILLIAM C. STRINGER**

Assistant District Manager  
Mineral Resources

cc:

SD, Utah (U-921)  
Utah Division of Oil, Gas, & Mining ✓  
Price Coal Office, (U-065c)

bcc:

Brent Northrup, (U-065)

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