



United States Department of the Interior

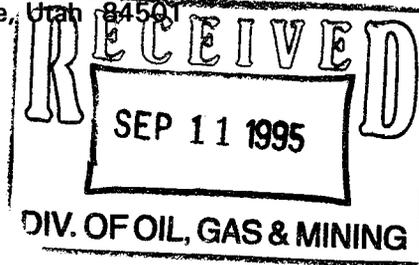
BUREAU OF LAND MANAGEMENT

Moab District

Price River Resource Area

900 North 700 East

Price, Utah 84501



cc JWC
JAB
P-L
aug file
9/11/95
BJ

3480
U-64375
(UT-921)

SEP - 8 1995

James Carter, Director
Utah Division of Oil, Gas and Mining
355 West North Temple
3 Triad Center
Salt Lake City, Utah 84180-1203

Re: Consultation

Dear Mr. Carter:

The U. S. Department of the Interior, Bureau of Land Management (BLM) is responding to a requirement under 43 CFR 3482.2(c)(2) to consult with the regulatory authority. The issue deals with the Trail Mountain Mine Resource Recovery and Protection Plan (R2P2) in Federal lease U-64375. PacifiCorp has submitted plans to BLM to change the mining method from the approved room-and-pillar to longwall mining. As of this date, BLM has not approved an R2P2.

PacifiCorp stated in writing on August 2, 1995, to BLM that "Due to the potential increase in ground water inflows as mining progresses down dip in Federal lease U-64375, a dewatering sump with **high capacity** pumps must be planned for. In order to provide long-term access for piping, electrical power and ventilation into this area, the 8th Right bleeder will have to be maintained without cribbing. As mining progresses to the north, access and support services will also need to be extended through these entries. To insure long-term stability of the 8th right access bleeder, a minimum 500-foot protective barrier is required on each side of the 2-entry development." (emphasis added). At the present time, it is our understanding that the mine produces approximately 22 gpm. The mine permit package (page 7-16) on file with our office states: "Only a limited amount of water is made within the mine."

BLM's concern is that the proposed mining method change from room-and-pillar to long wall may change the hydrological balance according to the company's own justification submitted as part of the R2P2. BLM is dealing with this issue and addressing it back to the company as far as the R2P2 is concerned. While we bring it to your attention for your consideration, we are *not* addressing the fact that there appears to be a change in the cumulative hydrological balance.

Any questions on this matter may be referred to Stan Perkes in the BLM Utah State Office at 539-4036.

Sincerely,

Mark E. Bailey
Area Manager

cc: UT-060, DM, Moab
Manti-LaSal National Forest
599 Price River Drive
Price, Utah 84501