



State of Utah
 DEPARTMENT OF NATURAL RESOURCES
 DIVISION OF OIL, GAS AND MINING

Michael O. Leavitt
 Governor

Ted Stewart
 Executive Director

James W. Carter
 Division Director

355 West North Temple
 3 Triad Center, Suite 350
 Salt Lake City, Utah 84180-1203
 801-538-5340
 801-359-3940 (Fax)
 801-538-5319 (TDD)

April 25, 1996

TO: Joe Helfrich, Permit Supervisor *JH*

FROM: Wm. J. Malencik, Reclamation Specialist *WJM*

RE: Resource Recovery and Protection plan, Trail Mountain Mine, PacifiCorp, ACT/015/009-96A, Folder #2, Emery County, Utah

This responds to your e-mail of April 15, 1996, regarding the referenced permit amendment. It specified that Jesse Kelley, Susan White, and I would review the amendment.

This amendment, to facilitate first mining, and, as a subsequent action, ultimately longwall mining involves two paramount issues, namely, (1) first mining beneath the escarpment/subsidence/rock spalling and (2) peregrine falcon and endangered species habitat/current sightings of peregrine falcons suspected to be nesting on the escarpment adjacent or near the fourth and fifth east panel setups. The third east panel mentioned in the amendment is not under the escarpment.

OVERVIEW

The technical analysis was approved by the Division (DOGM), for the Trail Mountain Mine under the name Beaver Creek Coal Company. The TA, dated April 15, 1991, is based on room and pillar mining for Beaver Creek Coal Company. The permit/MRP has been revised and approved for longwall mining by DOGM. The TA has not been updated.

These paragraphs need to be updated in the TA as a minimum in line with the currently approved MRP:

- (A) 521.140 - Mine Maps and Permit Area Maps
Delete reference to subsidence monument plan.
- (B) 522 - Coal Recovery
Update Coal Recovery per 96A amendment, Page 3-21.1 if the amendment 96A is to be approved.



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(C) 523 - Method of Mining
Update mining method from room and pillar to longwall mining per recent DOGM MRP and R2P2 BLM approvals.

(D) 525 - Subsidence
Update subsidence monitoring system. Photo grametric method has been approved by the Division. Delete discussion on conventional surveying monuments.

Should the peregrine falcon issue result in a change in the previously approved mining area, then TA needs to be updated.

(E) 333, 342, 358 - Wildlife
Update MRP together with the TA to include recent information on endangered species, habitat, abandoned nests and sighted peregrine falcons.

Since these section are the responsibilities of a biologist and engineer, and, because my involvement as a generalist, I will not prepare an updated TA on these enumerated engineering/biology items.

As related to the amendment documents provided by the permittee, specifically, the maps, they do not unfortunately have an all inclusive legend.

- The green dash/dot/dot line reflects the currently approved DOGM permit boundary.
- The blue dash/dot/dot line labeled USFS/BLM represents the common section line between section 1 & 6, TWP 18S, R6E, and TWP 18S, R7E, respectively. The survey land grid is necessary since some references are made in the background information on sections 1 & 6. These are not considered fatal amendment defects. However, other agencies when reviewing such documents can arrive at the same conclusions by reviewing the land ownership and mine maps.

My recommendations on the amendment are as follows:

- (1) Amendment 96A be approved. Further, recommend you as the the signing officer for the Division notify all responsible parties before the COB, 4/26/96 that PacifiCorp amendment is approved for first mining on the fourth and fifth east panels by the Division as of the COB 4/26/96.

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- (2) Second longwall mining of the fourth and fifth east panels beneath the escarpment is not approved until this matter is cleared through other responsible coordinating agencies. This must be covered by a subsequent amendment.
- (3) Photograph stations, photographing the escarpment and the base of the escarpment on the fourth and fifth panels be established together with survey stations for post decision evaluation. This must be included as a MRP amendment.
- (4) Approval of amendment 96A must not be considered, implied or construed that follow-up longwall mining beneath the escarpment will be approved on fourth and fifth longwall panels as a result of the approval of first mining.

My recommendations are based on these facts:

- Room and pillar first mining was approved and involved the same area as fourth and fifth east panels longwall mining, as described in the amendment.
- As related to subsidence/rock spalling no significant difference exists between first mining room and pillar and first mining for longwall.
- Room and pillar first mining approval concluded no adverse subsidence/rock spalling impacts. This conclusion has not been invalidated by the Division and/or cooperative agencies.
- Since subsidence/rock spalling is not a risk , then there should not be a risk to peregrine falcons as related to first mining.
- Approval of this amendment will provide the necessary intertie with the R2P2 approval as related to coal recovery.

On the other hand, both the R2P2 approval and the approval of this amendment does not commit the Division nor others to follow-up longwall mining in the panels involved in this amendment.

sd
enclosures

cc: Lowell Braxton, DOGM, SLC
Pam Grubaugh-Littig, DOGM, SLC