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DIVISION OF
OIL, GAS & MINING

CONSOL

Consolidation Coal Company
Mid-Continent Region
12755 Olive Boulevard
St. Louis, Missouri 63141
(314) 275-2300

File AQ/015/015 2 #

October 27, 1989

Ms. Susan C. Linner
Permit Supervisor
Utah Division of Oil, Gas, and Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180

Dear Ms. Linner:

Consolidation Coal Company submitted an amendment to its permit in June of 1988 to allow a change in the mining plan for the Emery Mine. This plan included mining under a part of the Quitchupah Creek alluvial valley floor. The data submitted stated that no secondary recovery would occur and that pillars of sufficient size to prevent subsidence would be left. The calculated safety factor of the pillars was 1.75.

In August of 1988, Consol received a denial to mine in the alluvial valley floor. The submittal was deemed to be deficient in providing "evidence indicating that damage to the quantity and quality of surface or groundwater will not occur at an unacceptable risk, and that there will be an insignificant disturbance to the farm production on the alluvial valley floor."

Consol is once again evaluating mining in the alluvial valley floor. The current plan is to drive three sets of six entries through the AVF to access reserves south and west of the AVF. Once again, secondary recovery will not occur and the pillars will be sized to prevent subsidence.

In order to prepare this amendment, I would appreciate a clarification of the Department's stance regarding our last submittal. If the plan is to prevent subsidence, what additional "evidence" is necessary to show that damage to surface and ground water and disturbance to farming will not occur? Please be specific so that we can address your concerns.

As our timing is short, a prompt response to this request would be greatly appreciated.

Sincerely,



Kevin L. Cheeks
Supervisor-Environmental Quality Control

/cjm