

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

February 10, 2009

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TO: Internal File

THRU: Steve Christensen, Reclamation Hydrologist / En Sci III / Team lead *SEC*
Jim Smith, Permit Supervisor / En Sci III / Task Manager *JS 2/12/09*

FROM: Peter Hess, En Sci III / Engineering *PH by SHS*

RE: Add CONSOL Controlled ZZ North Panel to MRP / Revise Permit and Adjacent Area Terminology, Consolidation Coal Company, Emery Mine, C/015/015, Task ID # 3099

SUMMARY:

The Permittee submitted an application to amend the mining and reclamation plan by adding the ZZ North Panel to the underground disturbance of the Emery Mine (an addition of 74 acres), and amend plan text to include adjacent area terminology to the Division on December 18, 2008.

Mining conditions in the 5th West area of the Emery Mine have been deteriorated by squeezing conditions, such that access into the L15 block of coal (Federal lease) has made it necessary to start new 2 North entries outby the squeeze. The Mine floor consists of soft clay bottom. The developed 2 North entries will be used as main entries to develop and extract the panels of the L15 block.

The Task ID # 3099 application contains an R2P2 modification approval from the BLM / Utah State Office dated September 19, 2008.

This engineering review consists of an evaluation of minor text revisions relative to adjacent area terminology in the subsidence section of the approved MRP.

TECHNICAL ANALYSIS:

OPERATION PLAN

COAL RECOVERY

Regulatory Reference: 30 CFR 817.59; R645-301-522.

Analysis:

The Task ID # 3099 application includes an R2P2 (resource recovery and protection plan) modification approval from the BLM / Utah State Office which will allow the access modification into the L15 panel area via the 2 North panel. The BLM approval letter (September 18, 2008) states in the **Approval:** (the access modification through 2 North mains) "...clearly will maximize the resource recovery while eliminating the coal quality issues in this zone."

Findings:

The minimum requirements of this section of the R645 Coal Mining Rules have been met.

SUBSIDENCE CONTROL PLAN

Regulatory Reference: 30 CFR 784.20, 817.121, 817.122; R645-301-521, -301-525, -301-724.

Analysis:

Subsidence Control Plan

The Emery Mine practices secondary coal extraction by developing pillars via multiple entry development. The pillars are then split, and the remaining fenders are mined out. Usually, one or two rows of pillars are worked at the same time in a staggered fashion to minimize continuous miner move distances and maximize production efficiency.

The Permittee indicates in Chapter V, Page 27 the "full extraction mining (planned subsidence) will occur at Emery in areas designated full extraction as noted on Plate V-5.

Plate V-5, **SUBSIDENCE MONITORING POINTS AND BUFFER ZONES**, indicates that full secondary extraction (planned subsidence) will occur in the L-15 panels area off of 5th West.

Buffer zones where no secondary extraction will occur (commitment by CONSOL) have been established along Quitcupah Creek, Christiansen Wash, and the alluvial valley floor on the west side of the permit area. One of this applications proposed text changes is to remove the word “permit” and insert the word **ADJACENT**.

Plate V-5 has also been modified to show existing and future subsidence monitoring points for the permit area and the ADJACENT area. Plate V-5 is P.E. certified by a registered professional engineer in the State of Utah.

All surface lands and coal ownership is controlled in fee by Consolidation Coal Company. Therefore the installation of subsidence monitoring points outside of the permit boundary but in the adjacent area will not be a problem relative to trespass.

All other requirements of **R645-301-525.400, Subsidence Control Plan Contents** have been addressed and approved by previous DOGM reviews.

Findings:

The application meets the minimum regulatory requirements of the R645 Coal Mining Rules.

RECOMMENDATION:

The Task ID # 3099 application should be approved.