



## State of Utah

DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF OIL, GAS AND MININGNorman H. Bangertter  
GovernorDee C. Hansen  
Executive DirectorDianne R. Nielson, Ph.D.  
Division Director355 West North Temple  
3 Triad Center, Suite 350  
Salt Lake City, Utah 84180-1203  
801-538-5340

September 6, 1988

Mr. David R. Smaldone, Director  
Permitting, Compliance & Services  
Utah Power and Light Company  
Mining Division  
41 North Redwood Road  
Salt Lake City, Utah 84140

Dear Mr. Smaldone:

Re: East Mountain Subsidence Monitoring Program, Utah Power and Light Company, Des-Bee-Dove Mine, ACT/015/017; Deer Creek Mine, ACT/015/018; Cottonwood/Wilberg Mine, ACT/015/019, Folder #5, Emery County, Utah

This letter is to transmit a copy of Rick Smith's review of the Utah Power and Light Company (UP&L) 1987 Annual Subsidence Report. Several discrepancies were noted in the review of the 1987 report, and must be addressed.

Several subsidence monitoring points, specifically above Deer Creek 5th and 8th East, Wilberg 5th and 7th, and 10th-13th Right panels, in 1987 were not monitored according to the approved plan. Please provide 1987 data no later than September 30, 1988, and assure that any change to the approved mining and reclamation plan is submitted through the formal amendment process and approved by the Division.

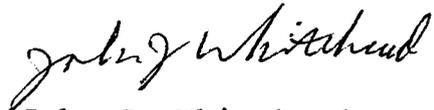
Secondly, it is incumbent upon UP&L to assure that the subsidence monitoring plan is submitted in a timely fashion. Special Condition #5 indicates that the report will be submitted within six months of date of data collection. Please assure that the 1988 report is submitted on time.

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D. R. Smaldone  
ACT/015/017, ACT/015/018  
and ACT/015/019  
September 6, 1988

In addition, Special Condition #6 on the Wilberg/Cottonwood permit requires UP&L to provide a plan for continuing subsidence monitoring at the Bureau of Mines area. The Division obtained a copy of a UP&L submittal dated January 3, 1985 (copy attached). Please assure the terms and conditions for this stipulation are followed for the 1988 survey.

Please feel free to contact me or Rick Smith if you should have any further questions on this matter.

Sincerely,



John J. Whitehead  
Permit Supervisor/  
Reclamation Hydrologist

djh  
Attachments  
cc: B. Warmack, P.F.O.  
WP+/27-28



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July 8, 1988

TO: John Whitehead, Permit Supervisor  
FROM: Richard V. Smith, Geologist *RVS*  
RE: East Mountain Subsidence Monitoring Program, Utah Power & Light Company

## Summary

Utah Power & Light Company (UP&L) has monitored subsidence since 1981 by photogramatic and conventional surveys. Review of the annual reports submitted for the years 1981-1987 indicates approximately 16 areas have undergone measurable vertical movement.

Five subsided areas were initially identified in the 1981 report and have been monitored, except for the Beehive 8th West, annually, Ten areas have been added to the monitoring program since 1984. Several areas have been sporadically dropped from the monitoring program (see attachment).

The 1987 Subsidence Monitoring Report proposes to terminate or conduct less frequent monitoring in six areas. The operator states that the reason for reducing the monitoring frequency in these areas is because previously collected data suggest the ground surface has stabilized. The operator independently terminated conventional surveying above the Deer Creek 5th - 8th East and Wilberg 5th - 7th/10th - 13th Right panels in 1987. This area encompassed the U.S. Bureau of Mines (USBM) study area. USBM terminated their conventional surveying in 1985 and UP&L conducted a conventional survey during 1986.

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John Whitehead  
July 8, 1988

The 1987 Subsidence Monitoring Report was received at the Division on June 29, 1988.

Special Conditions #5 and #6 attached to the approved permit for the Wilberg/Cottonwood Mine indicate the operator is committed to submitting the Annual Subsidence Monitoring Report within six months of data collection (#5) and providing a plan for continuing conventional subsidence monitoring in the U.S. Bureau of Mines Study area (#6). A search of Division and OSM files (personal communication Marcia Sneed, OSM Denver) did not locate a submittal of the above-noted plan by UP&L.

#### Recommendations

1. Inform the operator that Division concurrence should be sought, in the form of an Subsidence Monitoring Amendment, for reducing monitoring frequency in areas that data suggest are stabilized.

2. Inform the operator that the Annual Subsidence Report must be submitted in a more timely fashion or otherwise, Division enforcement action will be initiated.

3. Issue a NOV for noncompliance with Special Condition #6 of the approved Wilberg/Cottonwood Mine permit.

RVS/as  
9206R/42-43

COMPILATION OF EAST MOUNTAIN SUBSIDENCE MONITORING

MINE/AREA	MAXIMUM MEASURED SUBSIDENCE (ft)						
	<u>1981</u>	<u>1982</u>	<u>1983</u>	<u>1984</u>	<u>1985</u>	<u>1986</u>	<u>1987</u>
DC; 9th W	7	12	16	23	25	25	28
DC; 1st N	2	2.5	3	3	15	15	15
B ; 8th W	3	3	5	5			
B+D; 4th - 5th W	1.7	2.5	2	3	5	5	4.5
W ; 2nd W					4.2		3.5
DC; 4th - 6th E	2.6	5	5				
LD; 1st N		2	4	4	4	4	4
W ; 1st - 2nd W			2.5	3	4.2	5	
DC; 5th - 8th E				11	13	12	12
DC; 2nd - 5th R				5	7.7	7	7
DC; 2nd - 5th L				4	5.5	5	5.5
B ; 2nd N					5.7	6	6
DC; AN-AS						3	
W ; 2nd L						0	0
DB; Southern areas						3	2
DC; C+D N							3
C ; 6th - 7th E							5.7

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