



State of Utah
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 DIVISION OF OIL, GAS AND MINING

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August 22, 2001

TO: Internal File

THRU: Daron R. Haddock, Permit Supervisor *DRH*

FROM: James D. Smith, Reclamation Specialist *JDS*

RE: Underground Abandonment of Longwall Conveyor-Pan Sections, Energy West Mining Company, Deer Creek Mine, C/015/018-AB01F

SUMMARY:

On July 16, 2001, Energy West submitted to the BLM a "Lease Term and Condition Modification Request, Removal of Machinery, Federal Lease U-06039." The same day, Energy West notified the Division concerning abandonment of mining equipment in the Deer Creek Mine. The notification included a sketch map identifying the location of the abandoned equipment, a list of the equipment, and a copy of the request to the BLM.

Energy West plans on final coal extraction from 9th East longwall panel by late August or early September 2001. They plan to remove all equipment except for 140 American Longwall (1 m x 1500 mm) conveyor line pans with gob and face side accessories, which consist of toe plates, clevises, cable trays, bretby trays, spill plates and dynatrac castings, conveyor chain, and flight bars. It is planned to leave these in available entry crosscuts of the 9th and 10th East gate roads. No hoses, cables, lubricants, or oils of any kind are to be included in the abandoned equipment. Because of the worn condition of the pans and the low prices for scrap steel, Energy West considers it unreasonable and uneconomical to recover them.

Federal Coal Lease U06039 includes stipulations concerning abandonment of mining equipment underground: Section 10 – Delivery of Premises, Removal of Machinery, Equipment, Etc.; and Section 24 - Waste Certification, which documents abandonment of machinery within the federal coal lease. It is PacifiCorp and Energy West's understanding that the longwall units are not subject to the stipulations of the lease.

TECHNICAL ANALYSIS:

TECHNICAL MEMO

OPERATION PLAN

HYDROLOGIC INFORMATION

Regulatory Reference: 30 CFR 773.17, 774.13, 784.14, 784.16, 784.29, 817.41, 817.42, 817.43, 817.45, 817.49, 817.56, 817.57; R645-300-140, -300-141, -300-142, -300-143, -300-144, -300-145, -300-146, -300-147, -300-147, -300-148, -301-512, -301-514, -301-521, -301-531, -301-532, -301-533, -301-536, -301-542, -301-720, -301-731, -301-732, -301-733, -301-742, -301-743, -301-750, -301-761, -301-764.

Analysis:

UDOGM prepared a Cumulative Hydrologic Impact Assessment (CHIA) for East Mountain, which includes the Deer Creek Mine, in 1994. Abandonment of equipment underground was not covered in that CHIA.

Consequences from abandoned mining machinery and fluids were not included in the Probable Hydrologic Consequences (PHC) determination in the Deer Creek Mine MRP. The PHC identifies water encountered in the mine as "inactive", that is having little communication with the surface and not subject to annual recharge events. UDOGM cannot currently determine whether or not it is likely that the areas where these pans are to be abandoned will be flooded.

The permittee has submitted a letter indicating their intention to abandon longwall equipment; a sketch map and list of the equipment is included. The permittee has not submitted an amendment to the MRP adequately describing the machinery and the location where the machinery is to be abandoned.

Utah Coal Mining Rules require a coal mine operator to demonstrate steps to be taken to minimize disturbance to the hydrologic balance within the permit and adjacent areas and to prevent material damage outside the permit area.

Findings:

Accordingly, the permittee must address those deficiencies as found within this Draft Technical Analysis and provide the following, prior to approval, in accordance with the requirements of:

R645-301-121.300, The permittee must submit an amendment to the MRP, including maps, that adequately describes the machinery and the location where the machinery is to be abandoned and steps to be taken to minimize disturbance to the hydrologic balance and to prevent material damage outside the permit area.

RECOMMENDATION:

The Division should not approve abandonment of these conveyor pans until the MRP has been adequately amended to include the necessary information.