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

Michael O. Leavitt
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January 29, 2001

Chuck Semborski, Environmental Supervisor
Energy West Mining
P.O. Box 310
Huntington, UT 84528

Re: Abandonment of Mining Machinery: 14th /15th East Longwall Conveyor Pan Sections, PacifiCorp, Deer Creek Mine, C/0015018, Outgoing File

Dear Mr. Semborski:

Thank you for your January 10, 2001 response, which describes the equipment that is planned for abandonment underground at the Deer Creek Mine. The information you provided allowed us to better analyze the potential for impacts as a result of the abandonment. Your submittal indicates that the mining equipment planned to be left from the 14th /15th east longwall are: 140 American Longwall conveyor line pans with face and gob side accessories consisting of toe plates, clevises, cable trays, bretby tray, spill plates and dynatrac castings conveyor chain and flight bars. We have analyzed the proposed abandonment of this equipment to determine any potential impact to the hydrologic balance. A copy of our analysis is enclosed for your information and records. It has been determined that the abandonment should have no more impact to the hydrologic balance than the roof support systems utilized in the mine. The abandonment is not expected to cause material damage outside of the permit area; therefore the Division has no concern with the proposed abandonment. However, you may still need to obtain approval for the abandonment from the appropriate land managing agency (i.e. BLM, Forest Service). Thank you for providing the information that allowed us to complete our determination.

This concludes our review of this particular abandonment. Please keep us informed of any future disposal or abandonment at your mine.

If you have any questions, please call.

Sincerely,

A handwritten signature in black ink that reads "Daron R. Haddock".

Daron R. Haddock
Permit Supervisor

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Enclosure:

cc: Mary Ann Wright
Price Field Office

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January 17, 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 in the Deer Creek Mine, Energy West Mining Company, Deer Creek Mine, C/015/018

SUMMARY:

The BLM has received a request from Energy West Mining Company, dated November 8, 2000, for modification of lease U-06039. Energy West plans on final coal extraction from 14th East and 15th East longwall faces by late February 2001 and plans to remove all equipment except for 140 conveyor line pan sections. No hoses, cables, lubricants or oils of any kind are to be included in the abandoned equipment. Because of the worn condition of these pans and the low prices for scrap steel, Energy West considers it unreasonable and uneconomical to recover them.

The pans will be abandoned in cross-cuts off the 12th and 15th East gate roads, within federal lease SL-031286, under surface lands managed by the USDA Forest Service (USFS).

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. The following is a brief evaluation by UDOGM of probable impacts to the hydrologic balance in the area.

TECHNICAL ANALYSIS:

OPERATION PLAN

HYDROLOGIC INFORMATION

Regulatory Reference: R645-300-730

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.

A considerable tonnage of ferrous materials, such as steel roof bolts, wire mesh, and cans used in support pillars, is routinely abandoned in underground coal mines because the materials cannot be removed without endangering the lives of miners. In comparison to the amount of metal routinely abandoned during underground mining operations, the additional metal in the conveyor pans is not significant.

- Conditions in the abandoned mine are not conducive to oxidation or other chemical reactions;
- Recorded pH values for ground waters at the Deer Creek Mine are typically neutral to slightly alkaline;
- Oxygen would be absent or at low concentration both in the air and waters of the abandoned mine. Other oxidizing agents would not typically be found in an abandoned mine.
- The cool temperatures in the abandoned mine would tend to retard rather than accelerate most chemical reactions;

Assuming the mine were to flood and the conveyor pans to be covered with water, several probable results and impacts can be evaluated:

- Flooding of the abandoned mine might be relatively rapid, but once flooded, flow of ground water into, through, and out-of the void spaces of the mine should be slow;
- There is some potential for total discharge of 160 to 200 gpm from mine portals after reclamation. Energy West expects water quality to be the same as that of water currently being discharged from the mine under UPDES permits, but the abandoned conveyor pans are not specifically included in this evaluation.