

# TECHNICAL MEMORANDUM

## Utah Coal Regulatory Program

---

April 28, 2006

TO: Internal File

THRU: Jerriann Ernstsens, PhD, Environmental Specialist, Biologist, Team Lead

FROM: James D. Smith, Environmental Scientist

RE: Removal of Gas Well Buffer Zone, PacifiCorp, Deer Creek Mine, C/015/0018, Task ID #2462

### **SUMMARY:**

Merit Energy owns and operates gas well Federal #32-23 near the center of Sec. 23, T. 16 S., R. 6 E. An attached gas transmission line extends along USFS road #244 and exits the Deer Creek Mine permit area approximately 2,000 ft. south of the well.

When the Mill Fork Lease was initially permitted, the Permittee was required to protect this well from subsidence impacts with a protection zone, using a 15° angle-of-draw to design this buffer. As mining advanced in the southwest portion of the Mill Fork lease, a split seam was encountered that required a reevaluation of mine layout and timing. Effective August 12, 2005, PacifiCorp and Merit Energy established a working relationship to maximize recovery of both the coal and oil and gas estates, which would allow PacifiCorp to mine within the 15° angle-of-draw subsidence buffer zone around the well. A copy of the agreement between PacifiCorp and Merit energy was provided to the Division.

This amendment was initially received October 11, 2005. Mine operations entered the buffer zone in November 2005, before this amendment could be reviewed and approved by the Division.

Along with the removal of the gas well buffer zone, this amendment updates information in Volume 12 on the Andalex sublease and the rights-of-way in the Mill Fork tract. It also relocates sensitive information to the Private and Confidential folder.

Two minor deficiencies were identified in the November 23, 2005 Geology and Hydrology Tech Memo; the Permittee has adequately addressed both issues. This Removal of Gas Well Buffer Zone amendment should be approved.

**TECHNICAL MEMO**

| Permittee's Action                      | Date       | DOGM's Action                                   | Date       |
|---|------------|---|------------|
| <a href="#">Original submittal</a>      | 10/04/2005 | Assigned Task # 2351                            | 10/11/2005 |
|   |            | <a href="#">Geology and Hydrology Tech Memo</a> | 11/23/2005 |
|   |            | <a href="#">Deficiency letter</a>               | 02/27/2006 |
| <a href="#">Response to Task # 2351</a> | 03/20/2006 | Assigned Task # 2462                            | 03/22/2006 |
|   |            | <a href="#">Geology and Hydrology Tech Memo</a> | 04/28/2006 |

**TECHNICAL ANALYSIS:**

## **ENVIRONMENTAL RESOURCE INFORMATION**

Regulatory Reference: Pub. L 95-87 Sections 507(b), 508(a), and 516(b); 30 CFR 783., et. al.

## **GEOLOGIC RESOURCE INFORMATION**

Regulatory Reference: 30 CFR 784.22; R645-301-623, -301-724.

**Analysis:**

The reference to the buffer zone around the Merit Energy gas well has been removed, and information on the working relationship agreement between PacifiCorp and Merit has been inserted. Drawing MFS1866D shows that the north end of the gas transmission line connected to this well is within the projected subsidence zone.

Appendix B of Chapter 6 has been updated to include the exploration holes drilled within the permit area. The text lists these bore holes, also. The text and Appendix B both identify 35 boreholes plus the gas well.

**Findings:**

Geologic Resource Information is sufficient to meet the requirements of the Coal Mining Rules.

**RECOMMENDATIONS:**

It is recommended that this amendment be approved.

O:\015018.DER\FINAL\WG2462\jds2462.doc