

0004

file AU/015/019 #2



1407 West North Temple  
P.O. Box 899  
Salt Lake City, Utah 84110

September 30, 1988

Mr. John Whitehead, Permit Supervisor  
State of Utah  
Division of Oil, Gas and Mining  
3 Triad Center, Suite 350  
355 West North Temple  
Salt Lake City, Utah 84180-1204

**RECEIVED**  
SEP 30 1988  
DIVISION OF  
OIL, GAS & MINING

Dear Mr. Whitehead:

Utah Power and Light submits this letter and attachment as a means of beginning the amendment process for the Cottonwood/Wilberg mine permit. This is an official request to change the wording of Special Condition #6. It is requested that this condition be changed as follows:

"The Bureau of Mines entered into an agreement with Utah Power & Light Company (UP&L) in 1979, renewable on a yearly basis. This agreement was in force for several years and then was terminated. UP&L continued to monitor this area on an annual basis and collected field data. Comparisons of conventional ground versus aerial photogrammetric surveys indicate that the latter is the preferred method.

Therefore, UP&L will continue to publish reports on an annual basis summarizing the surface effects of underground mining. Methodology, frequency and accuracies will be compatible with past completed aerial photogrammetric data.

Each annual subsidence monitoring report will identify appropriate mitigation measures to be taken if significant subsidence impacts occur."

To substantiate the fact that aerial photogrammetric means should be used over conventional ground survey methods, the following has been submitted:

- ° Letter and attached figures dated August 10, 1988 from Kurt Snider, UP&L geologist.

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- Graduate thesis by Ruth Cousins, Colorado School of Mines (see Page 77 - Conclusion). Maps are not included since the Division and OSM have similar maps in annual subsidence reports.

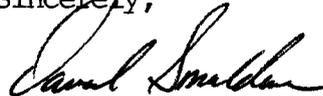
The main points in favor of aerial photogrammetry are as follows:

- More detail is achieved and better accuracy.
- Better indication of actual subsidence - relying less on extrapolation.
- More data points can be achieved.
- Photographs are a permanent record - additional measurements of a particular area of interest can be made at any time.

Discussions with Fred Allgaier at the Bureau of Mines, Denver Research Center, have pointed to aerial photogrammetry as the preferred method. Mr. Allgaier conducted the Bureau of Mines study on East Mountain.

If you have any questions please call. Three (3) copies of this information are enclosed.

Sincerely,



David Smaldone  
Director of Permitting,  
Compliance & Services  
Mining Division

DS:bb:6077  
Enclosure