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(U-067)

Noah District  
P.O. Box 970  
Noah, Utah 84532

MAY - 5 1989

Mr. Bart Hyita  
Manager, Technical Services  
Utah Power and Light Company  
Mining Division  
P. O. Box 310  
Huntington, Utah 84528

RECEIVED  
MAY 08 1989

DIVISION OF  
OIL, GAS & MINING

Dear Mr. Hyita:

The Bureau of Land Management (BLM) has received further information from Utah Power and Light Company (UP&L) by letter dated April 11, 1989, and by our meeting on April 12 concerning the mining assessment of the Cottonwood seam at the Cottonwood Mine. The additional information is in response to questions the BLM had on your original proposal to leave the Cottonwood seam unmined and revise the Hiawatha seam mining plan.

The information and studies that were provided detailing the extent of the heated coal and the associated risks to the Cottonwood seam have been analyzed. A BLM inspector verified a drill hole temperature reading during an inspection at East Mountain on July 20, 1988. Your interpretation and assessment of the impacts of the thermal gradients of the seam have been discussed with various sources inside and outside the BLM, including the Bureau of Mines and the Mine Safety and Health Administration's Technical Service Division.

We agree with your assessment that the Cottonwood seam has characteristics that make the risk of spontaneous combustion even higher than some known hot seams in the western U.S. This risk is compounded by the fact that longwall mining in both seams will result in air conduits through caved material and would add to the risk of contaminating the whole mine should a fire start in the Cottonwood seam. Leaving this seam intact will allow the Hiawatha seam to be extracted with the least amount of interseam connections with the high temperature zones in the Cottonwood seam.

We also agree with the assessment that to access and mine only two panels in the Cottonwood seam is not economically feasible. These economic and fire-potential risks are unacceptable and the BLM hereby considers the Cottonwood seam unrecoverable to protect larger federal coal reserves.

In dropping the Cottonwood seam, changes to the Hiawatha seam resource recovery and protection plan (R2P2) are proposed. The rock tunnels from the Hiawatha seam would be eliminated. The 11th East longwall panel in the Hiawatha seam would be lengthened by including the 11th East Mains as a J-entry headgate for the panel. The barrier block to the south of the rock storage rooms and rock tunnels would no longer be needed and the 12th East Mains would become the headgate to the 15th West longwall panel in the lower seam. The 4,500,000 tons of recoverable coal (original recoverable reserves estimate) in the Cottonwood seam would be lost to recovery. The reorienting of the mine workings in the Hiawatha seam would increase recovery of that seam by about 700,000 tons.

The modified Hiawatha seam R2P2 is approved, except for the barrier block left between 12th and 13th West. Originally, a J-entry "designated bleeder" system was planned in this 600-foot barrier block. It is our understanding that the disposition for the barrier is contingent on interpretations of MSHA regulations to which a variance to the designated bleeder requirement may be granted. We, in general, oppose the loss of coal due to regulations that promote little or no increases in safety. However, this issue is between agencies and not part of this approval. You are required to submit mining plans for this barrier block when the issue is settled. The rest of the mining layout, as depicted on the Attachment B map, will safely achieve maximum economic recovery. An approved copy of the map is enclosed.

The modification of the Hiawatha seam R2P2 will not change the areas where longwall mining was planned under the Castlegate escarpment. The south lease escarpment study will not change.

This action will have no effect on the surface environment that has not been addressed and no environmental analysis is needed.

If you have any questions, please contact Brent Northrup of my staff or Stephen Falk in our Price office.

Sincerely yours,  
/s/ Kenneth V. Rhee

ACTING  
District Manager

Enclosure:  
Approved plan w/map

cc: AM, SRRA (U-067), w/attach.  
SD, Utah (U-921), w/attach.  
DUGH, SLC, Utah, w/attach.

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