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## United States Department of the Interior

BUREAU OF LAND MANAGEMENT

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Moab, Utah 84532

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(U-065c)

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Mr. Steven E. Kochevar  
Mine Planning Administrator  
PacifiCorp Electric Operations  
One Utah Center  
201 South Main, Suite 2100  
Salt Lake City, Utah 84140-0021

RECEIVED

JUL 08 1992

DIVISION OF  
OIL GAS & MINING

Re: Cottonwood Mine Resource Recovery and Protection Plan  
(R2P2), 10th Right Longwall Panel.

Dear Mr. Kochevar:

On February 20, 1992, the Bureau of Land Management (BLM) received a request from Pacificorp to modify the approved R2P2 for the Cottonwood Mine in the 10th Right section. On April 14, 1992, the BLM granted partial approval to this request and required additional justification for the remaining portion. On May 27, 1992, Pacificorp submitted the additional justification to abandon these reserves. The request affects Federal coal lease SL-064900.

The original request was based on a sandstone channel encountered in the 2.5 North entries and in the 10th Right bleeder entries which scoured the coal to less than 5 feet thick. By projecting the channel across the proposed longwall block, Pacificorp maintains that the shearer would have to cut sandstone rock during every pass. This, in turn, would damage the longwall equipment and increase the ash level to over 20% for run-of-mine coal. After verification and analysis, the BLM concurred. However, an area of the panel between crosscuts 14 and 20 lies to the south of this geologic occurrence could potentially be mined with a continuous miner.

Pacificorp's justification for not mining this block of coal with a continuous miner and abandoning the remaining reserves in the 10th Right panel is summarized as follows:

- 1) A weak mudstone roof strata at the margins of the sandstone scour was encountered in the east end of the 10th Right development entries, which resulted in hazardous roof conditions. Projections of these geologic features would place much of the panel under these conditions.

- 2) Adverse loading conditions exist on the panel from mine workings in the upper seam.
- 3) A critical need for longwall panel development with continuous miners to assure uninterrupted longwall availability.
- 4) The mine utilizes continuous miners for development mining only.
- 5) Historical mining hazards and current lack of experience in mining with room-and-pillar methods in deep (1500+ feet) areas with uncertain geologic conditions.

Steve Falk, BLM Mining Engineer, inspected this area on January 17, February 21, and March 3, 1992 and noted the conditions of the development entries around the 10th Right panel. The extent of development in the overlying Deer Creek Mine was also inspected. The sandstone channel is at both the front and back end of the 10th Right panel where coal thicknesses of 4 feet and less were measured. Weak mudstone roof rock was observed past crosscut 22 in the headgate entries of the 10th Right panel, which made supporting the roof difficult. It was confirmed that unmined coal blocks and barrier pillars surround the mined-out C North longwall panel and overlie portions of the 10th Right panel.

Based on our observations and analysis, we arrived at the following findings with respect to PacifiCorp's justification for abandoning the reserves in question:

- 1) The weak mudstone cap rock affects recovery where it is encountered by mining. However, the occurrence of this material along the channel margin is variable, since it was only witnessed towards the eastern end of the 10th Right headgate entries. Probing with a continuous miner is the only practical way to confirm the presence of the mudstone roof in association with the reserves in question.
- 2) Our experience with multiple-seam mining in the region is that unmined blocks in an upper seam can transmit overriding pressures to the lower seam. Adverse loading conditions in the lower seam are most likely to occur beneath the unmined block in the upper seam. However, no adverse loading conditions were observed between crosscuts 14 and 20 in the 10th Right gate entries. PacifiCorp also planned to mine the 10th Right longwall panel even though the potential pressure override conditions were known. Therefore, the justification provided does not explain why the

reserves in question are not recoverable with a continuous miner.

- 3) The critical need for longwall panel development is caused by lack of planning and commitment of resources (continuous mining equipment and crew). PacifiCorp's failure to develop longwall panels far enough in advance to provide an immediate location for the longwall when panels are terminated prematurely, does not justify abandoning reserves.
- 4) PacifiCorp's declaration that continuous miners are used exclusively for main entry and longwall panel development contradicts the approved R2P2. The approved R2P2 clearly states that "in those areas where longwall mining is not practicable, room-and-pillar-sections are developed as production sections for continuous mining units."
- 5) A lack of experience with room and-pillar-mining does not relieve PacifiCorp of their obligations under the approved R2P2. PacifiCorp is the only operator in the region that refuses to conduct room-and-pillar mining in areas not conducive to longwall mining. The greater hazards associated with room-and-pillar mining are well documented, but have not made this mining method obsolete to everyone but PacifiCorp.

The BLM is aware that longwall recovery has distinct advantages over room-and-pillar mining in terms of safety and economics. However, when situations arise where longwall mining is not applicable, the BLM must determine whether maximum economic recovery (MER) can be achieved by room-and-pillar mining methods. The regulations at 43 CFR 3484.1 (c) (1 and 7) state that underground mining shall be conducted to prevent wasting of coal and to conserve recoverable coal resources, and no mining areas shall be abandoned without the approval of the authorized officer.

Our determination is that PacifiCorp has not provided sufficient justification for not recovering the reserves in question by room-and-pillar mining methods. PacifiCorp has the expertise to conduct first mining which could amount to the recovery of an additional 20,000 tons of Federal coal. We agree that there may be some overriding pressures, but first mining should provide sufficient support to determine whether any adverse conditions exist.

PacifiCorp's proposal to totally abandon the reserves in the 10th Right panel can not be accepted until the matter concerning room-and-pillar mining is resolved. Therefore, unless Pacificorp can provide additional argument within 30 days, the BLM will consider assessing PacifiCorp for the royalty of the Federal coal reserves in question.

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in question.

If you have any questions, please contact Gary Johnson in the  
Price Coal Office at 637-4584.

Sincerely,

*Gary Johnson*

for Assistant District Manager  
Mineral Resources

cc:

DM, Moab (U-065) (w/encl.)

SD, Utah (U-921) (w/encl.)

✓ DOGM, Salt Lake City (w/encl.)