

From: Pam Grubaugh-Littig (PGRUBAUGH-LITTIG)  
To: JCarter,LBraxton  
Date: Thursday, July 29, 1993 4:36 pm  
Subject: Bear Canyon Tank Seam-Denial

The Bear Canyon Tank Seam has problems with its configuration. The building of the road on a steep slope has not been shown to be stable under the operational or reclamation phases. The plan in its present form needs to be denied, due to the fact that this is a steep slope (coal mining and reclamation operations of steep slopes includes the construction of roads). NO SPOIL material can be placed on the downslope of a steep slope (R645-302-234.200), therefore, a cut-only road building scenario is the only acceptable method. The operator has not designed the Tank Seam road as a cut-only construction.

The operator has also not demonstrated that the slopes or the reclaimed slopes will be stable (the stability analysis is not in the submittal). The operator has not described a construction plan which assures that the disturbance will be contained within the proposed disturbance boundaries.

Co-Op is running out of coal. This is their only current option for coal. This is probably an emergency situation. Charles Reynolds, Co-Op Mining Company will be at the Division on Friday, July 30, to discuss. FYI!!!!!!

CC: H:ATeam