

From: Mark Reynolds <mreynolds@etv.net>
To: Pam Grubaugh-Littig <pamgrubaughlittig@utah.gov>, <waynewestern@utah.gov>
Date: 8/30/2005 10:29:47 AM
Subject: #3 Mine Escarpment

<cid:part1.04090209.01030801@etv.net>

CO-OP MINING COMPANY

P.O. Box 1245
Huntington, Utah 84528



Office (435) 687-2450
FAX (435) 687-2084

August 15, 2005

Coal Program
Utah Division of Oil, Gas & Mining
1594 West North Temple, Suite 1210
P.O. Box 145801
Salt Lake City, Utah 84114-5801

To Whom It May Concern,

Re: Application to Change existing Mining Plan, 3 Mine Escarpment Failure Amendment, Bear Canyon Mine, ACT/015/025, Task ID #2268

Attached is a document outlining our response to the technical deficiencies outlined in the letter dated July 27, 2005 as well as the documents changed in responding to the deficiencies.

Thank You,

Mark Reynolds

Enclosure(s)

Response the Technical Deficiencies for Task ID #2268

There has been some confusion by the submittal of two escarpment failure amendments. This was added to by a mistake made by the Permittee. We had originally planned on pulling pillars in the #4 Mine (above Bear Creek) first so had started on that amendment (the second one received by the Division). Plans changed and we decided to pull pillars in the #3 Mine (above Fish Creek). We mistakenly took the maps from the #4 Mine amendment so our maps showed changes in both areas. This mistake has been fixed on the maps.

This amendment is only talking about one small area above the #3 mine 6th right panel. I have circled this area on the map. Additionally it was discovered that there was only escarpments in one area and that they were small (approximately 5 ft.) stepping escarpments. This area is also circled on the map. At the time of the submittal we were not allowed to pull pillars in this area due to lease stipulations. An amendment to the R2P2 was submitted to BLM and after numerous meetings with them and the Forest Service they have agreed to allow escarpment failure in this one small area. A copy of the letter approving this was supposed to have been mailed to the Division. As soon as I get my copy, I will scan it and email it to you. At the current time we were only asking for permission in this one small area where there were not any substantial escarpments because we were hoping to mine there as soon as possible. We are in fact currently developing rooms under this area getting ready for pillar extraction.

It should be noted that during the review of this one small area the Permittee showed the BLM studies that included this area as well as all of Fish Creek. The Permittee mentioned to BLM that in the future we wanted to permit pillar extraction under areas where there are substantial escarpments, but we didn't want to do it at this time because it could delay pulling pillars in the 6th Right Panel. With this in mind the BLM looked at the entire Fish Creek area and stated that in their approval that they would approve the small area and also include a recommendation to approve pillar extraction under all escarpments in Fish Creek.

We don't want Division to be confused by this statement. Again at this time in order to speed of the approval of pillar extraction in the 6th Right panel we are only permitting this one small area. In this area there are no escarpments, no stream or springs, and no endangered plant or animal species. An amendment addressing the rest of Fish Creek will be submitted as soon as the two current amendments are approved.

R645-301-121.200, On page 1-4 in the paragraph that talks about barrier pillars, in the first sentence where it says, "barrier pillars will be left where required", the division has asked us to clarify the words "where required". I don't feel like anything else needs to be added to the MRP. There was not any specific examples given because we will leave barriers where required by anything. Commonly this would be lease stipulations, but also could include agreements with property owners, water users, DWR, Water rights, MSHA, or even rock climbers, basically anybody. In the third sentence we state that "mining will be stopped a minimum of 200 ft (barrier pillars) from the surface". This represents a complete different statement from the first sentence. This also represents one of the types of requirements the first sentence talks about. This statement in the MRP is in fact an agreement between C. W. Mining and the Division to

leave barrier pillars at all coal outcrop areas. This further represents to need to leave the first sentence as an all inclusive sentence.

R645-301-525.420, On Plate 3-3 there is a hatched area label escarpment location. The actual location of the escarpment is at the outer edge of the area. And the hatched area in fact represents the escarpment protection zone. Along coal outcrops a 200 ft. gap has been left between the mine workings and the outcrop. Basically on Plate 3-4A all areas outside of the subsidence zone are being left in place for either escarpment or outcrop protection. The size of barrier pillars between panels is not shown because it is not know yet. There size is based on safety and is determined in collaboration with MSHA based on depth of cover and currently unknown roof conditions. Their sizewill range form 30 to 100 feet.

R645-301-525.490, This is not concern in the area we are talking about. This was addressed at the first of this document.

R645-301-525.420, the mistakes on Plates 3-3 and 3-4A were corrected. It should be noted while mining may take place, there will be no full extraction outside of the subsidence zone.



