



## United States Department of the Interior

### BUREAU OF LAND MANAGEMENT

Utah State Office  
P.O. Box 45155  
Salt Lake City, UT 84145-0155  
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IN REPLY PLEASE REFER TO:  
3482  
U-38727  
(UT-923)

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Pamela Grubaugh-Littig  
Permit Supervisor  
State of Utah  
Division of Oil Gas and Mining  
1594 West North Temple Street, Suite 1210  
Salt Lake City, Utah 84114-5801

Re: Escapeway Portal, Co-op Mining Company, Bear Canyon #4 Mine, C/015/0025,  
Task ID #2352.

*Incoming  
C/015/0025  
Copy Wayne  
A & N  
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Dear Ms. Grubaugh-Littig:

The Bureau of Land Management (BLM) has received the subject mine plan amendment and has reviewed the resource recovery and protection plan (R2P2) portion of the plan for compliance with the Mineral Leasing Laws and regulations. Our comments follow:

Co-op plans to mine to the outcrop and established an escapeway/breakout portal from the 1<sup>st</sup> West Bleeder entries in the Bear Canyon #4 Mine (Tank Coal Seam, most upper seam). The location of the proposed portal appears to be located in the NW<sup>1</sup>/<sub>4</sub> SE<sup>1</sup>/<sub>4</sub> of section 24, T. 16 S., R. 7 E. This is just west of Federal coal lease U-38727 and located on private coal and surface lands. Hence, the BLM has no jurisdiction on this land and can neither authorize nor deny the proposal.

However, the eventual sealing of this portal could affect the integrity of the Federal coal reserves and this portal will facilitate mining of a large block of Federal coal. Therefore, we do have a few comments and recommendations for your permit approval.

We agree with your staff's assessment that an escapeway portal will have to be more than a hole that a person can crawl through. The purpose of an emergency escapeway is to have a safe alternate route out of the mine and will have to be supported to meet Mine Safety and Health Administration's (MSHA) requirements.

Also, an added airway through this portal could benefit production areas in the Federal coal and provide an escape route. There are some standard Mine Safety and Health Administration (MSHA) requirements for an escapeway portal roughly summarized as:

- entry to be an adequate size for safe passage
- safely supported portal entry
- an appropriate surface site
- a travelable path or other means from the portal site to an established surface site to be used in an emergency
- etc

We support the idea of an extra mine escape route as a good mining practice but agree that further elaboration of the plan is necessary, especially to establish that the portal can eventually be properly sealed.

As far as the proposed plans for sealing this portal, the method of backfilling to the block seals is unclear in the submittal. In any case, we agree with your staff's recommendation for further elaboration from the company on this point prior to approval.

In summary, BLM has no requirements relative to the R2P2 or public land uses as this proposal is under private mineral and surface ownership. However, it is important that portal construction and the eventual sealing design and installation of this portal are vital for the proper protection of Federal coal resources. Our recommendations support the stated requirement for additional geologic and design information to properly protect the ability to recover and protect Federal coal. If you need further information or have other questions, please contact Jeff McKenzie of my staff (801-539-4038) or Stephen Falk at the Price Field Office (435-636-3605).

Sincerely yours,



James F. Kohler  
Chief, Solid Minerals

cc: Price Field Office (UT-070)  
Peter Hess  
Utah Division of Oil Gas and Mining  
455 West Railroad Ave.  
Price, Utah 84501