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#2

3472
SL-062648
U-921

October 30, 1984

Memorandum

To: Walter Swain, OSM Senior Project Manager,
State of Utah, Denver

Attn: Ron Naton

From: Chief, Mining Law & Solid Minerals,
BLM-SO, Salt Lake City

Subject: Genwal Coal Company, Crandall Canyon Mine,
Emery County, Utah, Mining Plan

The volume forwarded with your letter dated September 24, 1984, and identified as "Permit Application, Crandall Canyon Mine, Lease Tract 2," has been reviewed for compliance with 43 CFR 3482.1(c) rules and regulations. Our comments follow:

1. On page 1-1 it states, "The following material constitutes a modification to an approved Mining and Reclamation Plan to obtain an underground coal mining Lease Modification for the Crandall Canyon Mine...." The plan as submitted is not complete and there are very few references to the approved subject plan.

2. The format of this submittal follows the Division of Oil, Gas and Mining guidelines titled, "General Guidelines for Organizational Format and Content - Permit Applications, revised 11/03/80." The resource recovery and protection plan (R_2P_2) or underground mining part of the submittal must follow the rules and regulations 43 CFR 3482.1(b) and include the material required by 43 CFR 3482.1(c) rules and regulations. The requirements for the R_2P_2 part of the submittal are interspersed throughout the permit application to the approved subject mine plan. The Bureau of Land Management (BLM) requires a cross-reference index for this type of format, that designates the sections, pages, and maps which contain the 43 CFR 3482.1(c) requirements. We suggest the cross-reference index should follow the format of the attached R_2P_2 check-list that lists in order the requirements of 43 CFR 3482.1(c). The BLM is the administrator of the Federal coal lease SL-062648 which is the property involved in the subject plan.

3. On page 3-28 of the geologic section, it states that outcrops will be protected by using a 30 degree angle-of-draw. We suggested an angle-of-draw of 20 degrees, which is closer to the data being developed in this coal field.

4. The plan indicates two minable coal seams. Coal analysis data on page 6-18 only covers the Hiawatha seam. Rules and regulations at 43 CFR 3482.1 (c)(3) require the appropriate data for all minable seams.

5. Plate 3-1 in the Tract 2 submittal only shows the mine plan for the Hiawatha seam in Tract 2. In order to comply with CFR 3482.1(c)(3) (ii) it will be necessary to include mine plan maps for the two minable seams covering the total property showing the overall mining sequence. The required two mine plan maps will also be needed to comply with 43 CFR 3483.1(c) rules and regulations at (3)ii, (3)(iv), (4)(i), (4)(v)(A), (4)(v)(B), (4)(v)(c), (4)(v)(D), (4)(v)(E), (6), and (7).

6. There should be a map included that shows the surface facilities or a reference in the narrative which refers to the pertinent map or maps that are a part of the approved mine plan.

7. The required maps referred to in item 5 above should also show the strike and dip of the minable seams.

8. Rules and regulations at 43 CFR 3482.1(a)(4)(ii) require isopach maps for each coal bed to be mined and the overburden and interburden. The overburden isopach map, plate 3-1, is the only one included in this submittal. Other required isopachs should be submitted.

9. On page 3-5 it states that the "projected mine development in Tract 2 is shown on Plate 3-2 (lower seam) and Plate 3-3 (upper seam)." Plates 3-2 and 3-3 for projected mine development are missing from the submittal. There is a map identified as Plate 3-2 and titled, "Subsidence Monitoring Map."

10. On pages 2-7 and 2-8 it states that, "Plate 3-4 shows the mine development plan by seam during each of the next 5 years, than for each 5-year period thereafter...." Plate 3-4 is missing from this submittal.

11. Rules and regulations at CFR 3482.1(c)(4)(v)(E) relative to the R2P2 plan, require the sequence of development and retreat. The BLM requires for this R2P2, copies of the development and retreat methods approved by the Mine Safety and Health Administration.

Orig. Sgd: J.W. Moffitt

cc: MDO
PRRA
Genwal
✓DOCM

Page 2-1

Also a portfolio of comments received to this date. (Appendix 2-1)

The portfolio of comments (Appendix 2-1) mentioned above is not included in the Appendices as indicated in the main text.

Table 2-1 starts on page 2-1 and Table 2-4 begins on page 2-11, but there are no Tables 2-2 and 2-3 in between pages 2-1 and 2-11. Do the tables need to be renumbered, or do Tables 2-2 and 2-3 need to be included?

Page 2-5

The Table of Contents for Chapter 2 indicates that there are Sections 2.4.1, 2.4.2, and 2.4.3 within this chapter. These three sections cannot be found in Chapter 2 of the main text.

Copy of this approval is included with this application as Item Number One, included with this chapter.

"Item Number One" is not included in Chapter 2 as indicated.

Page 2-7

Plate 3-4 shows the mine development plan by seam during each of the next five years, then for each five-year period thereafter for the life of the mine.

Plate 3-4 is not included in Chapter 3 as indicated. Our document copy indicates only Plates 3-1 and 3-2 in Chapter 3. This raises a question as to the status of Plates 3-3 and 3-4. Is Plate 3-3 supposed to be included in Chapter 3 even though it has not been included? Is Plate 3-4 mislabeled or is there a Plate 3-4 that needs to be included in Chapter 3?

Page 2-9

As required by UMC 800.11 and 30 CFR 800.11, the applicant will upon approval of this application, file copies of a Performance Bond conforming to 30 CFR 805 and 806 and UMC 805 and 806. Reclamation costs relevant to this bond are detailed in Section 3.6.7.

Section 3.6.7 is not included in Chapter 3 as indicated. This section is also referred to on page 3-13. Does this section need to be included or deleted?

Section 2.2.8 lists coal mining permits held by the applicant and principal shareholder.

Section 2.2.8 does not show coal mining permits held by the applicant or the principal shareholder as indicated in Chapter 2. This section only lists the name of the proposed mine.

Plate 2-1

This plate indicates Tract 1 as containing 80.00 acres, and Tract 2 as containing 75.23 acres. However, Tract 1 actually contains 83.64 acres, and Tract 2 contains 77.53 acres. The total acreage is 161.17 acres, not 155.23 acres as shown.

Page 3-1

Plate 3-1 shows the location of all surface facilities. In addition an accurate determination of where each facility is in relationship to the existing topographic as well as structural fixtures such as highways.

Plate 3-1 does not show any surface facilities as indicated. It is a layout of the underground mining configuration. The plate needs to be relabeled or redone to show the specific information as designated above.

Page 3-2

There are no processing or preparation facilities at this site.

It is indicated that there are no processing or preparation facilities at the mine site. A Forest Service employee did observe a crusher on site February 7, 1985.

Page 3-4

Plate 3-1 shows the location of all roads in the permit area. Total area for surface disturbance on the existing permit is approximately 6.6 acres. Individual areas are shown on Plate 3-1.

See previous comments concerning Plate 3-1 on page 3-1.

Page 3-5

Projected mine development in Tract 2 is shown on Plate 3-2 (Lower Seam) and Plate 3-3 (Upper Seam).

Plate 3-2 is titled 'Subsidence Monitoring Map', and there is no Plate 3-3 in Chapter 3 as indicated. The plates appear to be mislabeled while others are missing.

Page 3-6

Roof control is described in the approved roof control plan (Appendix 3A).

The roof control plan (Appendix 3A) is not included in the main text of Chapter 3 as indicated.

Page 3-8

Manmade features and structures do not exist on the mineable portion of the permit area.

This paragraph indicated no man-made features or structures exist on the

mineable portion of the permit area. Cadastral survey monuments exist within the angle of draw zone as shown on Plate 3-2. Any disturbance to such monuments will require that the monuments to be replaced or restored as per Special Stipulation #15 found in Federal Coal Lease SL-062648.

Page 3-17

Projected mining by year is shown on Plates 3-2 and 3-3.

See the previous comments for Plates 3-2 and 3-3 on page 3-5.

The acreage of this proposed Tract 2 Permit Area is 75.23 acres. This is shown on Plate 2-1 and 3-1.

See the previous comments on acreages for Tract 2 on page 1-1 and Plate 2-1. Also see the previous comments concerning Plate 3-1 on page 3-1.

This mining is shown by year on Plates 3-2 and 3-3.

See the previous comments for Plates 3-2 and 3-3 on page 3-5.

Page 3-18

Since the current (and likely future) land use is for dispersed, non-developed recreation, and since the operation on this permit area involves no surface disturbance, no impacts are expected to the current or future land use.

This paragraph should also include wildlife, and livestock grazing as well for the current land use.

Page 3-19

See Chapter 7, Sections 7.1.4 and 7.2.4 for a complete discussion of the hydrology of the area.

Section 7.1.4 is the 'Mitigation and Control Plan', and Section 7.2.4 is the 'Groundwater Monitoring Plan'.

See Chapter 7, Sections 7.1.6 and 7.2.6.

The Table of Contents for Chapter 7 does not include either Section 7.1.6 or 7.2.6 as being in Chapter 7. Neither one of the sections can be found in the main text of Chapter 7.

Page 3-23

Only two species found in the area are on the endangered species list; the bald eagle and peregrine falcon.

See the previous comments about Golden Eagles on page 1-2.

Page 4-3

Grazing, oil and gas and other mineral leases for the permit area will be supplied to the Division upon the issuance.

Federal Coal Lease U-062648 occupies some of the same land area as the Crandall Canyon Sheep and Goat Allotment, and Federal Oil and Gas Lease U-15208.

Page 4-4

There are no active oil and gas leases within the area.

See the previous comments on oil and gas leases on page 4-3.

Page 6-10

The anticline and syncline axis have a predominant east-west orientation, while the fault zones are generally oriented north-south (see Figures 6-2 and 6-3).

Figure 6-2 is not included in Chapter 6 as indicated.

Page 6-12

Coal reserves are calculated for the upper seam, based on an average coal height of 10' over 75.23 acres. The lower seam reserve figure is calculated in the same manner using an average coal height of 6'. Recoverable reserve is based on 50% of in-place reserve. The following is a breakdown of reserves by seam:

Seam	In Place (tons)	Recoverable (tons)
Blind Canyon	1,316,000	658,000
Hiawatha	790,000	395,000
TOTAL	2,106,000	1,053,000

See comments for acreage calculations concerning Lease Tract 2 on page 1-1.

The new mineable coal for Lease Tract 2 is estimated to be approximately 1.5 million tons, which does not coincide with the above figures for In-Place or Recoverable coal tonnages. Genwal Coal Company should update the MRP and this PA with data collected from their recent in-mine core drilling program.

Appendix 11-1, Page 5

To control dust emissions from road travel by coal haulage vehicles, we will gravel the haulage-access road and periodically water the road, the water to be mixed with a dust palliative as per manufacturer's directions.

We refer you to Special Stipulation #8 in the lease agreement, and to Management Requirement #21 in the EA approved May 18, 1981 for the Crandall Canyon road and bridge.

SPECIAL STIPULATION #8 - The lessee shall provide for the suppression and control of fugitive dust on all haul roads, and at coal hauling, transportation, and storage facilities. The migration of road surfacing material shall be controlled by watering, chemical treatment, or hard surfacing. Loss of gravel shall be periodically replaced.

MANAGEMENT REQUIREMENT #21 - A pavement design and structure (surface treatment or asphalt layer) must be provided that will prevent losses from the roadway during snow removal operations, from heavy truck traffic on steep grades, fugitive dust, and waterborne sediments during rains. A timetable for installation of this complete, will be furnished by the Forest Service.

To control dust emissions from road travel by access vehicles, we will use the same control methods as above with the same efficiency and reduce our total emissions from 16.98 lbs. per day to 2.6 lbs. per day.

See the response immediately above that quotes Special Stipulation #18 from the lease agreement, and Management Requirement #21 in the EA approved May 18, 1981 for the Crandall Canyon road and bridge.

The Forest Service consent on May 11, 1983, to Genwal's MRP in Crandall Canyon was based on the assumption that the company would adhere to the 23 management requirements included the EA. To date, those stipulations which have not been complied with are listed as follows:

2. Public parking must be separate from mine parking and allow for vehicle turn-around.

3. The Forest development road will be separate from and compatible with the mining operation.

4. The road through the mine site will be designed and maintained so that drainage off the road surface will be into the sediment pond for treatment.

6. The Forest development road through the site will not be used as part of the coal handling operation.

7. The sediment pond must be designed and maintained to meet Forest Service and OSM specifications.

10. An adequate sewage disposal plan will be submitted and when approved will be adhered to.

18. Prior to mining, the lessee shall secure adequate baseline data to quantify the existing surface resources on and adjacent to the lease area. The data will be gathered in consultation with and concurrence by the surface managing agency, and shall be adequate to locate and quantify the inter-relationships of the geology, topography, surface hydrology, vegetation and wildlife. The baseline data will be established so that future observations can be made at regular intervals for comparison.

19. The lessee shall establish a monitoring system to locate and quantify the progressive and final effects of underground mining activities on the land surface, the underground and surface hydrology and on the vegetation. The monitoring system shall utilize techniques which will provide a continuing record of change over time. The monitoring shall be an extension of baseline data at representative locations and will be conducted in a manner approved by the surface managing agency in consultation with the State and Federal regulatory agencies.

20. All drainage facilities will be designed and maintained to adequately control the water and prevent erosion.

21. Adequate drainage and sedimentation facilities must be designed and maintained to pick up and treat water intercepted on the disturbed areas of the mine site.

22. The mining company shall provide the Forest Service with an unencumbered right-of-way across any fee lands encountered for the reconstruction of the Forest development road.

23. The site will be so constructed as to encompass the entire surface facilities for the mining operation providing for unrestricted thru-road access while providing adequate protection of the adjacent stream.

The Forest Service is requesting that Genwal comply with those management constraints which have been disregarded to date.

If we can be of further assistance, please contact the Forest Service.

Sincerely,

W. H. Boley
for
REED C. CHRISTENSEN
Forest Supervisor