



STATE OF UTAH
NATURAL RESOURCES
Oil, Gas & Mining

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September 12, 1985

CERTIFIED RETURN RECEIPT REQUESTED
P-592-429-564

Mr. Leonard Witkowski
Genwal Coal Company, Inc.
8185 South Willow Street
Englewood, Colorado 80112

Dear Mr. Witkowski

Re: Revised Subsidence Control Plan, Genwal Coal Company, Inc., Crandall Canyon Mine, [ACT/015/032, #3, Emery County, Utah

The Division has completed its review of Genwal's latest (August 16, 1985) response to our July 17, 1985 letter which identified deficiencies in the Revised Subsidence Control Plan for the Crandall Canyon Mine. The following concerns still exist and must be addressed prior to completion of the review and approval of this proposal:

UMC 771.23 - PGL

1. There should be a detailed legend clearly explaining all appropriate distinguishing items on the map (e.g., permit boundary, development, recovery, mined out areas, etc.). Plate XII-3 is difficult to easily understand. The permit boundary must be indicated. It is difficult to follow items #21-23 on Plate XII-3, as stated on page 3.
2. The text states that proper supports will be placed in areas of questionable roof control. These areas should be delineated on the appropriate map (page 2).
3. Please label Item XII-13 more clearly. It is difficult to identify any feature (or lack thereof) on this item. A recent photo (more recent than June 4, 1980) would be best to include in the report.

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UMC 784.20 - PGL

1. "Occurance of subsidence will not produce material damage or diminution of value or foreseeable use of land", is concluded on page 7 of the report. The narrative continues and states that "land is used for domestic grazing in the areas of gentle slope and wildlife habitat over the total acreage". Grazing could be negatively impacted by subsidence. A statement should be included stating that if the grazing is impacted by subsidence, the operator will compensate the owner or other appropriate party for the damages.
2. Page 5 justified the lower factor of safety by stating that the "SME Engineering Handbook (pg 13-104) states that as this ratio approaches 12 that the pillars are regarded as being able to bear any load". This rationale related to use of the Holland-Gaddy formula not the Obert Formula. Please modify the reasoning.

UMC 817.52(a), 817.124(a) - DC

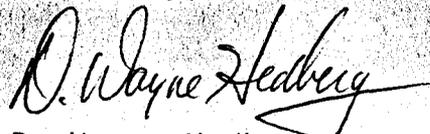
1. The permit application for the Tract 2 lease, Crandall Canyon Mine submitted by Genwal on August 15, 1985 indicates that three springs in the area adjacent to the mine permit area have water rights owned by the U.S. Forest Service (Vol. 2, Table 7-2 and Figure 7-3). The operator must state what measures will be taken to insure that these water rights will not be affected. The operator should incorporate these springs into a monitoring program in order to identify any interruption or diminution to the springs caused by subsidence. Additionally, the operator must address any mitigation of these water rights should they become affected by the mining activities.
2. Page 10 of the Subsidence Control Plan states that spring SP-30 will be monitored as described in this permit. Please clarify how the quantity of discharge from this spring will be monitored.

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Please provide a response to these remaining questions by October 3, 1985. Thank you for your assistance and cooperation in resolving these permitting matters. If possible, please provide your response in a format which would reference and allow direct insertion by replacement page and date to those sections of the most recent plans on file with this office. Please contact me, Dave Cline, or Pam Grubaugh-Littig should you have questions concerning this review.

Sincerely,



D. Wayne Hedberg
Permit Supervisor/
Reclamation Hydrologist

dwh

cc: Allen Klein
Reed Christensen
Andy King
Lowell Braxton
Pam Grubaugh-Littig
Dave Cline
Dave Lof

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