

*Mine file
S Loman*

United States
Department of
Agriculture

Forest
Service

Manti-LaSal
National Forest

599 West Price River Dr.
Price, Utah 84501

Reply to: 2820

Date: May 23, 1989

RECEIVED
MAY 26 1989

DIVISION OF
OIL, GAS & MINING

Richard Holbrook
Office of Surface Mining
Reclamation and Enforcement
Brooks Towers
1020 15th. Street
Denver, Colorado 80202

RE: New Lease, Genwal Coal Company, Crandall Canyon Mine, ACT/015/032, Folder #2, Emery County, Utah

Dear Mr. Holbrook:

We received a copy of Utah Division of Oil, Gas and Mining's Draft Decision Document and Technical Analysis for the addition of Federal Coal Lease U-54762 into the Crandall Canyon Mine Permit Area on May 16, 1989. We did not receive a copy of the draft of final Decision Document and Technical Analysis for review prior to transmittal of the approval package to your office for action.

As discussed with Aaron Howe on May 22, we have reviewed the Draft Decision Document and Technical Analysis and do not feel that the Division adequately addressed our concern regarding protection of escarpments in the lease area in Stipulation No. 1, UMC 817.121. Please reference our letter dated February 9, 1989, which was attached to the Division's State Decision Document and Technical Analysis.

The stipulation requires quarterly visual inspections of areas where mining has taken place beneath the escarpments which face or are visible from Huntington Canyon for a period of two years following developmental mining and again after recovery mining. Even though the escarpment in Huntington Canyon is of primary concern, we are also concerned about potential mining induced escarpment failure on the lease in Crandall Canyon. Mining induced escarpment failures in Crandall Canyon would indicate that failures could also be induced by recovery mining under similar conditions in Huntington Canyon. The stipulation should not be limited to Huntington Canyon and should require visual inspections on a more frequent basis (weekly) during the time that recovery mining under the escarpments is conducted.

The stipulation requires the operator to commit to notifying the Regulatory Authority within a period of 30 days if any subsidence or escarpment failure occurs on the permit area. This is not satisfactory. Upon discovery of an escarpment failure, the operator should be required to cease pillar recovery

operations and immediately notify the Regulatory Authority. If the Regulatory Authority, BLM and the Forest Service determine that continued pillar recovery could result in significant resource damage, the operator will be required to cease recovery mining under the escarpment until an acceptable mitigation plan can be developed and/or continued pillar recovery in the escarpment area is specifically approved.

We suggest that the stipulation be revised to read as follows:

"The applicant will be required to conduct quarterly visual subsidence/escarpment failure surveys of the areas where mining has taken place beneath escarpment areas visible from Huntington and Crandall Canyons for a period of two years following development mining and again after recovery mining. The survey results shall be recorded and submitted to the Regulatory Authority no more than 30 days following the survey. During recovery mining operations under the escarpments, the frequency of visual surveys shall be increased to weekly intervals. In the event that escarpment failures occur above pillar recovery areas, the operator shall immediately cease pillar recovery under escarpments and notify the Regulatory Authority. Pillar recovery operations in the escarpment areas may not proceed until specifically approved by the Regulatory authority, in consultation with the BLM and Forest Service."

We consent to the addition of the new lease into the permit area subject to the incorporation of the above revised stipulation or a mutually acceptable alternative. If you have any questions, please contact Aaron Howe or Carter Reed at our Forest Supervisor's Office in Price, Utah.

Sincerely,

/s/ Aaron L. Howe

for
GEORGE A. MORRIS
Forest Supervisor

cc:
Division of Oil, Gas and Mining (L. Braxton)
D-3
C. Reed