

Genwal Coal Co., Inc.

P.O. Box 1201 • Huntington, Utah 84528-1201 • (801) 687-9813

September 12, 1989

*received
9/15/89*

Mr. Lowell Braxton
State of Utah
Division of Oil, Gas & Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, UT 84180-1203

RE: Genwal Coal Company
Stipulation Submittal
ACT/015/032

Dear Mr. Braxton:

Please find enclosed for your review and approval, Genwal Coal Company's response to the Division of Oil, Gas & Mining's permit stipulations dated July 31, 1989, and Small Area Exemptions deficiency correspondence dated August 2, 1989.

Should you have any questions or need additional information, please contact me at 687-9813.

Sincerely,



Allen P. Childs

tr

Enclosures

ATTACHMENT A

STIPULATIONS

Genwal Coal Company
Crandall Canyon Mine
ACT/015/032
Emery County, Utah

July 31, 1989

Stipulations UMC 817.48 -(1-2) - JSL

- ✓ 1. Within 30 days of permit approval the operator must submit to the Division a commitment to sample and analyze any underground development materials temporarily stored at the surface immediately after the material is first exposed to the mine site and to treat or otherwise bury any identified acid- or toxic-forming materials within the required time frame.
- ✓ 2. Within 30 days of permit approval the operator must submit to the Division a commitment to monitor the roof, floor, midseam, and materials disposed of underground for its potential acid- or toxic-forming characteristic as defined in Table 6 of the Division's "Guidelines for the Management of Topsoil and Overburden". This analysis must be accomplished once a year or more if the general location of the mining operation changes or a change in the physio-chemical quality of the floor or roof is encountered.

Stipulation UMC 817.121-.126 -(1) - DWD

- ✓ 1. The applicant will be required to conduct quarterly visual subsidence/escarpment failure surveys of 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. During recovery mining operations under the escarpments, the frequency of visual surveys shall be increased to weekly intervals. The survey results shall be recorded and submitted to the Regulatory Authority no more than 30 days following the survey. 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 with the consent of the BLM and Forest Service.

A commitment to the requirements of this stipulation should be inserted in an appropriate section of the MRP and submitted to DOGM within 30 days of permit approval.

Canyon mine produces no development waste, however small amounts of rock wastes are generated in unexpected roof falls and overcasts. This rock waste is not brought to the surface, it is disposed of on pillar lines or stored in areas that have been mined and no second mining is to be done. The material disposed of on the pillar lines will be of the same nature that naturally caves in the pillaring process, therefore no leachate will be formed other than that associated with normal pillaring. In no event will the disposal of this material interfere with future recovery of the coal resource without consent of the BLM or the managing agency of the coal resource. All disposal of the developing waste will be done in accordance with MSHA regulations.

Underground development waste, coal processing waste, and all potential acid or toxic forming materials will be returned to the underground workings. The sediment pond sludge will be blended with the coal and sold. The sediment pond sludge will be stored temporarily at the west end of the coal loading area prior to shipment. The pond sludge will be confined with a coal berm and all excess water will be controlled with hay bales or silt fence. The underground development waste that is brought to the surface or coal processing waste, will be temporarily stored at the west end of the coal stockpile prior to disposal underground on the pillar line. There will be no coal processing waste dams, valley fills, head-of-hollow fills or durable rock fills.

The material disposed of underground will be hauled by scoop from the temporary storage area to an active pillar line. All material will be disposed of in accordance with MSHA regulations. A copy of the MSHA approval will be submitted to the Division after we receive confirmation from MSHA.

Any underground development materials that are temporarily stored at the surface will be sampled and analyzed for acid or toxic forming materials. All potential acid or toxic forming materials will be returned underground as soon as practical.

On an annual basis the in-mine roof, floor and midseam will also be analyzed for its potential acid or toxic forming characteristics.

3.3.9.2 SOLID WASTE

The waste generated by the normal activities which include, but are not limited to the following: wood, paper, scrap metal and belting etc., will be disposed of underground on pillar lines where possible in accordance with MSHA regulations. No oil or grease will be intentionally disposed of underground. All solid waste brought to the surface will be disposed of in a trash container until the container becomes full, at which time the con

There are no plans to backfill any area of the mine with waste material in order to reduce subsidence.

Should any structures such as roads, bridges etc. be adversely impacted as a direct result of subsidence the operator will repair or replace the structure, whichever is more economical.

12.4.4 SUBSIDENCE MONITORING PLAN

Applicant commits to implement the proposed subsidence control plan and applicant hereby incorporates the same into this submittal.

The US Forest Service has prepared an aerial monitoring system for the Crandall Canyon Mine which has been accepted for implementation. Vertical and horizontal control have been established on the thirteen ground control stations, refer to Plate 12-3 for location. This method of subsidence monitoring has been accepted by other mines in the area and has met with DOGM approval. The program is included as Item 12-5. The aerial monitoring plan with the USFS will be discontinued after the 1987 photographic year. The USFS will generate a baseline map of the lease area with the information already obtained from the previous flights. The applicant will submit this baseline map as soon as it is produced.

Twelve of the thirteen survey control stations are outside the potential area of subsidence and can then be established according to standard surveying practice without the need of establishing subsidence monuments.

Beginning in the 1988 the mine area will be surveyed on an annual basis with a private contractor and a map will be produced with approximately 80 points showing the elevation of each. Every fifth year a color infrared survey will be done to monitor the vegetation variations. These flight lines will be made to coincide with the USFS flight lines.

The following information will be forwarded to the division on an annual basis when it becomes available:

1. A current map of the underground workings with areas delineated as to where the second mining will begin.
2. The approximate dates when second mining will commence and terminate.
3. The date of monitoring.
4. The vertical and horizontal positions of all monitoring points surveyed during that year.

A visual subsidence/escarpment failure survey will be conducted at quarterly intervals at areas where mining has taken place beneath escarpment areas visible from Huntington and Crandall Canyon for a period of two years after development mining.

During recovery mining (pillaring) under the escarpment, visual subsidence/escarpment surveys will be conducted at weekly intervals.

The subsidence/escarpment survey results will be recorded and submitted to the appropriate regulatory authority no more than 30 days following the subsidence/escarpment survey.