

## GENWAL COAL COMPANY

November 3, 1989

Ms. Susan C. Linner  
Division of Oil, Gas & Mining  
3 Triad Center, Suite 350  
355 West North Temple  
Salt Lake City, UT 84180-1203

RE: Response to Stipulation  
USFS-(1) and  
UMC 817.121-126-(1)-DWD

Dear Ms. Linner:

Please find enclosed Genwal Coal Company's response to DOGM's stipulations due November 3, 1989, (DOGM's correspondence October 17, 1989). Please insert the following pages into the GCC MRP.

If you have any questions, or need any further information, please feel free call at me 687-9813.

Sincerely,

GENWAL COAL COMPANY



Allen P. Childs  
Mine Manager

tr

Enclosures

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DIVISION OF  
OIL, GAS & MINING

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.

All the subsidence points over the panels will be surveyed annually to determine that subsidence has occurred. If no subsidence has occurred at a particular point for a period of two years the point will be monitored bi-annually. If the bi-annual monitoring determines that subsidence has not occurred for three consecutive surveys then the monitoring will be done on a five year increment. 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.

Oil contaminated soil from the gas and oil storage area will be disposed of at the Sinbad landfill prior to reclamation or moving of the facility. Areas outside the berm area will be cleaned and disposed of when an area of ten square feet is saturated. This oil contaminated material will be placed in the solid waste container prior to final disposal in the landfill.

No toxic or hazardous waste will be disposed of in the Sinbad landfill. In the unlikely event that hazardous or toxic material is encountered. Genwal will notify the Division of Oil, Gas and Mining and the State Health Department for disposal plans.

#### 3.3.9.3 SEDIMENT POND WASTE

Sludge removed from the pond, which is removed during the cleaning process, will be temporarily stored on the surface west of the coal stockpile. All moisture and runoff from the sludge pile during temporary storage will be contained. Preceding the removal of any sediment pond sludge material, an adequate gravel or earthen berm will be constructed to contain sludge and runoff. Prior to cleaning the sediment pond, the sludge will be tested for any toxic contaminants. If toxic contaminants are present, the Department of Health and the Division of Oil, Gas, and Mining will be consulted about the proper method of offsite disposal. Non-hazardous sludge removed from the pond will be temporarily stored for drying on the surface west of the coal stockpile. All moisture and runoff from the sludge pile will be contained. Preceding the removal of any sediment pond sludge, a meeting will be arranged with the Division and the Manti-LaSal National Forest to assess the adequacy of the containment berm.

#### 3.3.9.4 SANITARY WASTE

There will only be one regularly assigned employee on the surface per shift. To handle the sanitary waste needs on the surface, a portable construction type toilet will be located on the surface and maintained in accordance with approved State Health standards. This toilet will be removed upon completion of the bathhouse.

A bathhouse is proposed to be installed underground. The waste from the toilets and showers will be pumped to a holding tank located underground. The holding tank will be pumped and the materials disposed of by a licensed contractor at a State Health approved disposal site. See Appendix 3-14. The applicant will keep records of the sewage pumped from the tank by the contractor. The sanitary waste needs for the miners underground will be handled in the accordance with MSHA regulations.