



State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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Division Director

355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203
801-538-5340

October 17, 1989

Mr. Allen P. Childs
Mine Manager
Genwal Coal Company
P.O. Box 1201
Huntington, Utah 84528

Dear Mr. Childs:

Re: New Lease Stipulation Review and Permit Renewal Stipulation Responses, Crandall Canyon Mine, ACT/015/032, Folder #3, Emery County, Utah

The Division and U.S. Forest Service have completed review of Genwal Coal Company's (Genwal's) response to stipulations for the New Lease approval, received September 11, 1989 (Price Field Office).

The response to Stipulations UMC 817.48-(1)and(2)-JSL has been found to be adequate. The response to stipulation UMC 817.121-.126-(1)-DWD was not found to be adequate by the Manti-LaSal National Forest, as detailed in the attached letter. In addition, in responding to the condition, Genwal changed the already approved subsidence monitoring plan by removing the commitment to monitor vegetation by color infrared photography every five years. This is not acceptable to either the Division or the Forest Service. The commitment must be incorporated back into the plan.

In response to your letter, received October 17, 1989, regarding a time extension for your response to outstanding stipulations, the following timetable will be in effect:

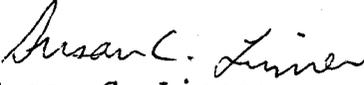
<u>Due Date</u>	<u>Material Due</u>
November 3, 1989	Response to Stipulation USFS-(1) Response to Stipulation UMC 817.121-.126-(1)-DWD
November 17, 1989	Response to Stipulation UMC 784.13-(1)-JRH Small Area Exemption Plates

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Mr. Allen P. Childs
Genwal Coal Company
ACT/015/032

The response to stipulation UMC 771.23-(1)-SCL, received October 13, 1989, is currently being reviewed.

Please contact myself or Rick Summers if you need clarification.

Sincerely,


Susan C. Linner
Reclamation Biologist/
Permit Supervisor

cl
Attachment
cc: R. Summers
H. Sandbeck
BT45/339-340

United States
Department of
Agriculture

Forest
Service

Manti-LaSal
National Forest

599 West Price River Dr.
Price, Utah 84501

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OCT 16 1989

Reply to: 2820

Date: October 13, 1989

DIVISION OF
OIL, GAS & MINING

Susan C. Linner
Permit Supervisor
Utah Division of Oil, Gas, and Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

RE: New Lease Stipulation Responses, Genwal Coal Company, Crandall Canyon Mine (ACT/015/032), Folder #3, Emery County, Utah - 12.4.4 SUBSIDENCE MONITORING

Dear Ms. Linner:

Genwal's provisions for subsidence monitoring are inadequate.

- 1) The following provision from the Crandall Canyon Mine PAP dated 11/25/88.- 12.4.4 paragraph 4 was apparently omitted from the revised pages for the new lease.

Every fifth year a color infrared survey will be done to monitor the vegetative variations. These flight lines will be made to coincide with USFS flight lines.

We require that adequate provision for vegetative monitoring be included in the PAP. If Genwal's provision differs from the above wording, we request that it be submitted to us for review before we consent to the PAP.

- 2) We are concerned with the abandonment of subsidence monitoring points. The last few sentences in paragraph 4 of the revised pages of 12.4.4 state:

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 or the operator will request to the division that the monitoring of that point be discontinued.

Before monitoring of a particular point can be discontinued, it must be demonstrated that subsidence is substantially complete in that area.

These issues must be resolved prior to our consent to the PAP for the new lease addition.

Sincerely,

A handwritten signature in cursive script, appearing to read "Sam L. Home".

for
GEORGE A. MORRIS
Forest Supervisor

cc: P. Kilbourne
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