



State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF STATE LANDS AND FORESTRY

Norman H. Bangertter
Governor
Dee C. Hansen
Executive Director
Richard J. Mitchell
Division Director

355 West North Temple
3 Triad Center, Suite 400
Salt Lake City, Utah 84180-1204
801-538-5508

January 16, 1992

RECEIVED

JAN 17 1992

DIVISION OF
OIL GAS & MINING

Daron Haddock
Permit Supervisor
Division Oil, Gas, and Mining
Building Mail

Dear Mr. Haddock:

RE: ACT /OI5/032-91-1
Crandall Canyon Mine

I have reviewed Genwal's response of January 14, 1992, to the concerns I expressed over the Crandall Canyon Mine Plan. The explanations and amendments submitted by Mr. Marshall satisfy my concerns over retreat mining of main/submain entries and updrilling to explore for multiple coal seams. I still have concern, however, regarding excessive barrier pillars.

The Federal Regulations in 43 CFR Part 3484.1 (6) quoted by Mr. Marshall apply only to federal coal leases and in no way govern the mining of coal from state owned lands. State coal leases have no requirement that a barrier pillar be left at the property boundary. Further, the MSHA regulations referred to by Mr. Marshall do not in fact require a barrier pillar at property boundary lines. The regulations, 30 CFR Part 75.1701, simply require that boreholes be drilled in advance of mining to test for the presence of noxious gases in the working face of the coal seam whenever mining approaches within 50 feet of known abandoned mine workings. There are no abandoned mine workings in the area being mined by Genwal so the regulation is of no consequence.

Assuming approval of the proposed Forest Service subsidence area, Genwal should re-design the layout of mining panels in the state leases. Panel design should leave only such barriers as may be required to engineer mine safety and minimize geometrical residuals of coal and should allow for mining up to the property line of the state leases. Boundary pillars that were pre-maturely developed in ML 21569 should be considered for retreat mining in the re-design of panel layout to maximize overall coal recovery from the state leases.

Sincerely yours,

JOHN T. BLAKE
MINERAL RESOURCES SPECIALIST

JTB/tdw
cc: Jay Marshall
Richard Mitchell