



State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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March 3, 1994

Mr. Larry Johnson
Genwal Coal Company, Inc.
P. O. Box 1201
Huntington, Utah 84528

Re: Deficiencies in IBC Application, Genwal Coal Company, Crandall Canyon Mine, ACT/015/032-94B, Folder #3, Emery County, Utah

Dear Mr. Johnson:

The Division has completed a review of Genwal's application for an Incidental Boundary Change (IBC) received on February 11, 1994. A few items have been identified that require additional information or clarification. Following is a list of the outstanding items that will need to be addressed prior to our issuing final approval of the IBC. Please review the items and provide a response as quickly as possible but in no case later than April 1, 1994.

- 1) Plate 1-1A does not show Federal Coal Lease U-068082 and its relation to the IBC. The IBC area can mistakenly be assumed to be part of the adjacent state lease ML-25169.
- 2) Discrepancies in the acreage for the IBC will need corrected. Appendix 1-1 list acreage as 152.18 acres while page 4 of the introduction lists 143.91 acres.
- 3) The submittal includes a legal description of the IBC, but this description is not formatted to be inserted into the Mining and Reclamation Plan. It is simply an unnumbered page. The description of the IBC needs to be included in Chapter 1 in the right-of-entry section.
- 4) The Division will need to receive right-of-entry information for the new lease.
- 5) Genwal must commit to only conduct first mining in the IBC area.
- 6) Genwal must demonstrate that first mining in the IBC will not result in any subsidence. The information supplied to the division will include but not be limited to the coal's strength and the pillar size and safety factor.
- 7) The applicant did not state if the subsidence monitoring program would need to be modified to detect ground movement associated with mining in the IBC



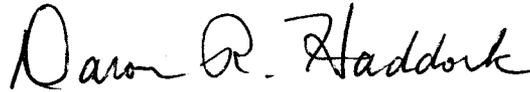
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area. Genwal must discuss the effects mining in the IBC area will have on the subsidence monitoring program.

The Division has yet to receive comments from other agencies or reviewers. There may be additional deficiencies that you may need to address. We will inform you if additional work is needed.

Thank you for your help in resolving these issues. If you have any question with regard to these requirements please call Jim Smith, Wayne Western, Paul Baker or myself.

Sincerely,



Daron R. Haddock
Permit Supervisor

cc: W. Western
P. Baker
J. Smith
IBCDEFICIEN.GEN