

0017



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

Michael O. Leavitt
Governor
Ted Stewart
Executive Director
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Salt Lake City, Utah 84180-1203
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March 28, 1995

Randy Gainer
Genwal Resources, Inc.
P. O. Box 1201
Huntington, Utah 84528

Re: Forest Service Requirements, Genwal Resources, Inc., Crandall Canyon Mine,
ACT/015/032, Folder #3, Emery County, Utah

Dear Mr. Gainer:

As you are aware the Division takes a lead role in coordinating interagency review of mine plans. Comments have been received from the U. S. Forest Service and the State Trust Lands Administration who administer lands upon which Genwal mines. The issues raised need to be resolved in order for these agencies to consent to continued mining within their respective boundaries.

Enclosed are two letters from the Forest Service and one letter from the Trust Lands Administration, which identify the concerns that need further attention. Please review them and make sure you understand the issues involved. You may need to contact the respective agency directly to get clarification. A complete response to all concerns must be received in our offices by no later than May 12, 1995.

Please call if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Daron R. Haddock".

Daron R. Haddock

enclosures

cc: Aaron Howe (USFS)
John Blake (TLA)
P. Grubaugh-Littig
J. Helfrich

forest.gen



United States
Department of
Agriculture

Forest
Service

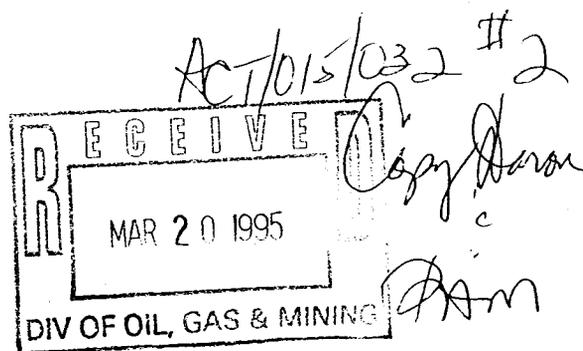
Manti-La Sal
National Forest

599 West Price River Dr.
Price, Utah 84501
(801) 637-2817

File Code: 2820-4

Date: March 17, 1995

Pamela Grubaugh-Littig, Permit Coordinator
Utah Division of Oil, Gas and Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203



Dear Pam,

We have reviewed Genwal's responses to our previous comments on LBA #9, and DOGM's most recent comments. The following items must still be addressed:

Page 3-8, Section 3.22.22, 5th paragraph.

Genwal must immediately notify the Forest Service whenever the flow of a seep or spring changes, other than variations which directly correlate with precipitation changes. They can not wait until a determination of the cause has been made.

Page 3-17, 2nd paragraph.

Genwal must conduct spring and fall macroinvertebrate studies every three years. They have only committed to do surveys until the year 2000, but they plan to be mining until at least the year 2005.

Page 3-17, 3rd paragraph.

Same statement as on page 3-8. Genwal must notify the Forest Service whenever there is a change in flow of a spring or seep, not just when it is proven to be mining related.

Page 3-35, 2nd paragraph.

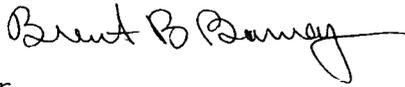
Same as page 3-17, 2nd paragraph. Genwal must do macroinvertebrate surveys every 3 years for the life of the mine, not just until the year 2000.

Section 5.25.

Two points mentioned in our first review have still not been addressed. The potential for subsidence under perennial streams must be discussed, and calculations shown for roof support between pillars where there is less than 250 feet of overburden.

If you have any questions, please contact Dale Harber at (801) 637-2817.

Sincerely,

A handwritten signature in cursive script, appearing to read "Brent B. Ramsey".

for
AARON L. HOWE
Acting Forest Supervisor

United States
Department of
Agriculture

Forest
Service

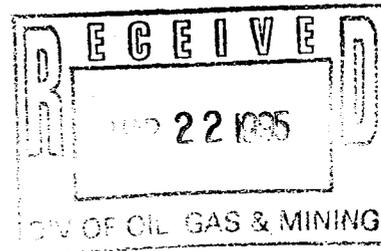
Manti-La Sal
National Forest

599 West Price River Dr.
Price, Utah 84501
(801) 637-2817

File Code: 2820-4

Date: March 20, 1995

Pamela Grubaugh-Littig, Permit Coordinator
Utah Division of Oil, Gas and Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203



RE: Change of Mining Methods - From Continuous to Longwall Mining, Crandall
Canyon Mine, Genwal Coal Company, ACT/015/032-95C, Folder #2, Emery County,
Utah

Copy Aaron: RAM

Dear Pam,

We have reviewed Genwal's proposed change to longwall mining for their Crandall Canyon Mining and Reclamation Plan, and DOGM's Technical Analysis of the proposal. The DOGM analysis was very thorough, and we agree with it completely. We have the following additional comments:

Page 7, Pumping from Crandall Creek

Genwal has committed to not dewater Crandall Creek. They should actually commit to maintaining a minimum in-stream flow, which will be determined during 1995.

Page 7, Water Quality Impacts

Genwal is aware that they are impacting Crandall Creek by the salt used for ice removal and by coal dust. Both these items must be addressed and appropriate mitigation proposed. The coal dust may become more of a problem as coal production increases from 1.6 million tons per year to approximately 2.5 million tons per year.

Please contact Dale Harber at (801) 637-2817 if you have any questions.

Sincerely,

L. Janette Archibezque

for
ARRON L. HOWE
Acting Forest Supervisor

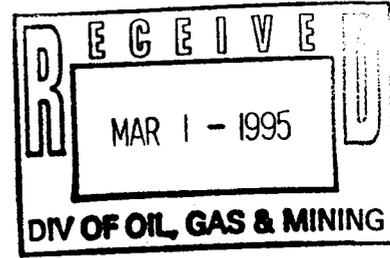


State of Utah

School and Institutional
TRUST LANDS ADMINISTRATION

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Michael O. Leavitt
Governor
Scott Hirschi
Director



March 1, 1995

Pam Grumbaugh-Littig
Division of Oil, Gas & Mining
3 Triad Center, Suite 350
Salt Lake City, Utah 84101

RE: Crandall Canyon Mine

Dear Ms. Grumbaugh-Littig:

*Longwall Amendment
95C*

ACT/015/032 #2 Copy Done

Thank you for copying me the January 23, 1995, Amendment submitted by Genwal Coal Company to initiate a longwall in the Crandall Canyon Mine. The last version of the mine plan received by TLA, with respect to state trust lands, is "Chapter 14", dated May 18, 1992. Chapter 14 stipulates that Genwal Coal Company will up drill holes to a maximum of 150', on one-half mile spacings, in the mains of Section 2, T16S, R6E, as the mains are being developed, in order to evaluate upper coal seams for mineability.

PAM

The Trust Lands Administration has not approved any change in the updrilling requirement and expects the mains to be updrilled prior to any longwall mining. Also, the Trust Lands Administration is concerned for coal recovery outside of the proposed longwall panels within Section 2. Genwal Coal Company should address the mining of "outside" areas by room and pillar in order to maximize coal recovery from the mine.

Thank you for this opportunity to make comment.

Sincerely,

John T. Blake

JOHN T. BLAKE
MINERAL RESOURCES SPECIALIST

*? Is this part of
protection of perennial
streams question
or
barriers?*

JTB/tdw

cc: Jay Marshall

