

File: ACT/041/002
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**Southern Utah
Fuel Company**

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Division of
Coastal States
Energy Company

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JUL 16 1985

DIVISION OF OIL
GAS & MINING

July 16, 1985

Mr. D. Wayne Hedberg
Permit Supervisor
Division of Oil, Gas & Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, UT 84180-1203

Dear Mr. Hedberg:

We received your letter regarding the BLM's approval of our underground gob disposal program on July 9, 1985. You pointed out that this type of activity should not normally cause significant concern to the Division. We agree. Indeed, the BLM approval states the project "will have no effect on the surface environment and no environmental analysis is necessary as per NEPA."

However, for reasons which are unclear to us, you have requested that we provide the Division further information on this matter anyway. To make the situation even more puzzling, your request is for information which already has been provided in the SUFCo M&RP/permit application package. The information was submitted in response to requests made during your now-six-year-long permit application review process. The Division has already made a determination that the information is complete and technically adequate.

In response to your request (and to reacquaint you with the permit application), a description of the appropriate M&RP content locations is provided below.

With regard to your request that we address any acid or toxic-forming materials and discuss the impact on ground water quality:

1. Analyses of the strata above and below the seam, which makes up the "gob" material, have been provided on pages 68 through 147 in Volume 3 of the M&RP/PAP.
2. Additional discussion under "Rock Characteristics, Acid-Toxic, Pyrite, Clay, and Alkalinity" is found on page 6 of the 1981 Geology supplement in Volume 7 of the M&RP/PAP.

Mr. D. Wayne Hedberg
July 16, 1985
Page 2

3. A detailed description of the effects of the mining operation on ground water is included on pages 59 through 62 of the 1980 hydrology study in Volume 4.
4. Further discussion on the impact to ground water quality was added to the M&RP in the hydrology supplement in the back of Volume 4.

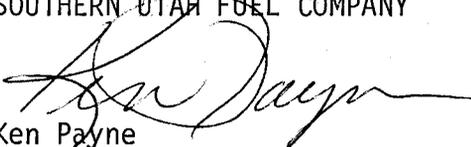
With regard to your request for information whether the program has MSHA approval and meets the requirements of UMC 784.25, information was already sent to your office in:

1. The 1980 response to a U.S.G.S. comment found on page 265 of Volume 3.
2. The 1981 response to a Division comment under 784.11(b) in Volume 7.
3. It is our understanding UMC 874.25 applies to Coal Processing Waste such as is typically generated in heavy media wash plants. The material being handled near 1R1W is underground development waste as covered under UMC 874.19. The comments under 784.11(b) in combination with the hydrology reports in Volume 4 and the subsidence reports in Volume 5 satisfy the requirements of UMC 874.19.

The potential effects on subsidence of boundaries between mined and unmined areas is discussed in detail in the subsidence section of Volume 5. This particular situation would not be expected to be any different with respect to subsidence than would occur in an area where the crews are forced to abandon a localized area due to adverse mining conditions.

Should you have comments or questions pertaining to this response, please contact Kerry Frame or me at 637-4880.

Sincerely,
SOUTHERN UTAH FUEL COMPANY


Ken Payne
V. P. & General Manager

KAF:cfc

xc: Steve Falk, BLM
John Garr, CSEC
Diane Nielson, DOGM