



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

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TO: Daron Haddock, Permit Supervisor  
FROM: Wayne H. Western, Reclamation Engineer *W H W*  
RE: SUFCo Exploration Project, Southern Utah Fuel Company, Convulsion Canyon Mine, ACT/041/002, Folder #2, Sevier County, Utah  
DATE: October 18, 1993

**R645-301-630                      Operation Plan**  
**R645-301-631                      Casing and Sealing of Exploration Holes and Boreholes.**

Applicant's Proposal:

The Applicant refers to Section 7.6.5 of the MRP for casing and sealing of exploration holes and boreholes. In Section 7.6.5. the Applicant states that wells will be sealed and backfilled by placing a concrete plug from total depth to surface.

Analysis:

The engineering regulations do not specifically address the sealing of exploration holes. They are concerned mostly with sealing shafts and audit. Sealing the drill holes with cement appears to satisfy all state and federal requirements.

Deficiencies:

None.

**R645-301-632**

Applicant's Proposal:

The subsidence and subsidence monitoring points are discussed in detail in Section 5.2.5 of this MRP.



Analysis:

The exploration holes that are scheduled to be drilled will have a negligible effect on subsidence.

Approval to drill exploration holes is not approved by the Division to conduct mining operations that would cause subsidence to occur outside of the approved subsidence areas.

Deficiencies:

None.

**R645-301-633                      Exploration Drilling**

Applicant's Proposal:

The exploration area is located within the current mining permit boundary of permit ACT/041/002. SUFCo intends to drill 14 drill holes over a 3 year period.

Some of the drill sites will be accessed using existing wheel tracks and a few will require that road be built off U.S. Forest Service roads or existing wheel tracks.

Analysis:

Any new road construction must be approved by the Division in accordance with R645-301-534. The Applicant has not addressed the proposed roads in the MRP.

Wheel tracks may be used if permission from the landowner or management agency has been obtained. If the use of the wheel tracks will result in disturbance of the top soil then the wheel tracks will be considered roads by the Division and must be permitted.

Deficiencies:

1. The Applicant must identify all new roads that will be constructed in conjunction with the exploration work.
2. The Applicant must receive approval from the Division for all new roads prior to their construction.
3. Wheel tracks can only be used if the Applicant demonstrates that there will be no significant impact to the topsoil.