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# United States Department of the Interior

## BUREAU OF LAND MANAGEMENT

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DIV. OF OIL, GAS & MINING

IN REPLY REFER TO:  
3480  
(UT-923)  
UTU-76195

AUG 29 2003

Mary Ann Wright  
Utah Division of Oil, Gas, and Mining  
P.O. Box 145801  
Salt Lake City, Utah 84114-5801

*C/041/002  
e-mail Aaron,  
Dave,*

Re: Undermining East Fork of Box Canyon Amendment,  
Canyon Fuel Company, SUFCO Mine, C/041/0002, Task ID #1640, Outgoing File.

*Mary Ann*  
Dear ~~Ms. Wright~~:

We have reviewed the subject permit amendment. The Bureau of Land Management (BLM) as the lessor, is responsible for determining if the permit change is in accordance with the Federal coal lease terms and conditions, the Mineral Leasing Act of 1920 as amended and the regulations at 43 CFR 3480. BLM has approved the Resource Recovery and Protection Plan (R2P2) modification supported by a Determination of National Environmental Policy Act (NEPA) Adequacy on July 31, 2002. After reviewing the terms and conditions of Federal coal lease UTU-76195, BLM has determined that this permit change is consistent with the lease.

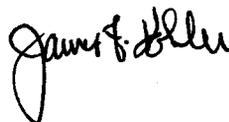
In our review, we have noted the following specific comments:

1. Page 5-26 – BLM recommends changing the wording in the last paragraph from, “will be sealed and/or backfilled upon abandonment using the best available technology to prevent disturbance of the overlying streams”, to “will be backfilled or backfilled and sealed as necessary upon abandonment or use the best available technology to prevent disturbance of the overlying streams”. Changes to the underground workings could affect the R2P2, which would require a BLM approval of a R2P2 modification before implementation.
2. Page 5-27 - Experimental Mining and Subsidence. This approval will under mine the Castlegate Sandstone. As part of the R2P2 approval, the same lease stipulation that deals with the perennial streams also deals with the escarpments. BLM has approved the R2P2 to mine under the stream and also undermine the Castlegate escarpment in this area of modification. BLM requests that this language be modified to reflect this action.
3. Figure 1 should be updated to the latest map. The setup rooms for the area that is approved to be under mined have been developed outby the original stream exclusion area in the panel and may create a different subsidence trough.

4. BLM considers the monitoring plan for the perennial stream insufficient. It appears that there will only be visual checks for the monitoring plan. BLM recommends that a more rigorous plan be put into place by the operator with input from BLM, DOGM and the FS. This will help determine any impacts that may occur.

If you have any questions feel free to contact Mr. Stan Perkes at 801-539-4036.

Sincerely,

A handwritten signature in black ink, appearing to read "James F. Kohler". The signature is written in a cursive style with a large initial "J".

James F. Kohler  
Chief, Solid Minerals Branch

cc: Price FO