



San Juan Coal Company
New Mexico Coal

August 31, 2001

Dave Mankiewicz
Bureau of Land Management
1235 La Plata Highway, Suite A
Farmington, NM 87401

RE: Protest of Applications for Permit to Drill (APDs)

Dear Mr. Mankiewicz:

As per our August 30, 2001 conversation, San Juan Coal Company (SJCC) hereby requests that certain conditions be placed on any future APDs proposed for the Deep Lease (Federal Coal Lease NM NM 28093) and Deep Lease Extension (Federal Coal Lease NM NM 99144) areas designated for underground mining.

Currently, APD's have been filed by Richardson Operating Company and Dugan Production Corporation for the following locations which/are included within SJCC's approved mining plan:

<u>Operator</u>	<u>Location of Proposed APDs</u>
Richardson Operating Company	Sections 30 & 31, T30N, R14W, San Juan County
Dugan Production Corporation	Sections 24, T30N, R15W, San Juan County Sections 17, 18 & 19, T30N, R14W, San Juan County

BEFORE THE
OIL CONSERVATION DIVISION
Case No. 12734 Exhibit No. — **A19**
Submitted By:
Richardson Operating Company
Hearing Date: November 11, 2001

SJCC protests the issuance of these permits unless the operations authorized under them are conditioned to ensure that the proposed drilling activities are conducted in such a way as to avoid unreasonably interfering with the ability of SJCC to safely extract coal under its two leases.

SJCC's concerns are threefold: (1) the presence of steel casing in the basal coal seam; (2) the potentially adverse impacts of hydraulic fracturing on roof stability; and (3) the increased risk of spontaneous combustion occasioned by hydraulic fracturing. Appropriate restrictions on the manner in which any drilling is conducted are requested in order to deter risks to the health and safety of the underground mining workforce associated with the future development of coalbed methane production in the immediate mine area. Such restrictions are also required to ensure that the activities of the oil and gas operator do not result in making significant portions of the BLM's and State's recoverable coal unminable.

Specifically, the following conditions must be imposed to meet existing MSHA safety standards and prevent the possibility of SJCC's mining operations encountering steel casing within the basal coal seam (8 seam) during longwall and continuous mining activities:

The operator must be required to:

- Use fiberglass casing within the target basal coal seam.
- Alternatively, if steel casing is permitted and used within the target basal coal seam, mill out casing in the wellbore 5 feet above and below the basal coal seam at least 6 months in advance of the date when SJCC's mine plan projects that the area of the wellbore will be mined.
- Clean wellbore to 200 feet below the basal coal seam or bottom of hole, if less
- Plug wellbore from 200 feet below the basal coal seam or bottom of the hole, if less, to surface
- Monument wellbore location, as required
- Identify the hole location at the coal depth intersection
- Use pressurized cores (pre and post drainage) at predetermined distances from the wells to verify the extent of gas desorption
- Place dye in the hole prior to cement filling to identify the extent of damaged ground
- Provide detailed records of well development and plugging and abandonment (P&A) procedures, including the following:
 - Identify hole depth, casing depth, fractured zone (i.e., both vertically and horizontally), water input volume, and water discharge

The longwall system that will mine the majority of the reserves is composed of large, articulated mobile roof supports 1000 feet wide, a chain conveyor system carrying off the mined coal, and a twin drum shear assembly actually cutting and loading the coal from the seam. The 2000 horsepower shear assembly weighs approximately 80 tons and actually cuts the coal with two 3 ½ foot by 7 foot diameter spiked drums each weighing about 5 tons. These drums rotate counter clockwise towards the operator at about 40 to 50 rpm while the shear trams along the coal face at 60 feet /minute. The kinetic energy developed by this system is enormous, and is specifically engineered to cut/break the coal out of the seam in a controlled manner. At the cutting face, fine explosive coal dust and gasses are also produced in the process and controlled by airflow and water sprays. If these drums were to strike steel well casing during production, the casing would likely be shredded, creating showers of sparks, ripping cutter bits off the drums, and throwing the debris down the face in the direction of the shear operators. The sparks could potentially ignite the coal dust and/or methane gasses. If the wells are not cemented shut properly, a disastrous methane explosion could occur.

further investigated and test drill holes utilizing either a wire line to extract the cores or if appropriate, pressurized cores have been considered in Section 24 of the Deep Lease to collect desorption data and determine the volume of methane in the basal coal seam.

We also wish to emphasize that until the problems outlined in this letter are investigated and resolved SJCC will oppose any proposed increase in permitted well density.

Should you have any questions on these issues, please feel free to contact me at 505-598-2107.

Yours sincerely,



Lynn Woome
Technical Services Coordinator
Projects Development Group

CC: Rock Funston
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