



JACKET NUMBER PR-19,20,21 et al
PROPOSED RULE (50 FR 13797) (74)
TRAPPER MINING INC.

July 29, 1985

DOCKETED
USA

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OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Secretary of the Commission
Attn: Docketing and Service Branch
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Sirs:

We are writing to comment on the licenses and radiation safety requirements for well-logging operations proposed rule as published 50FR 13797 (April 8, 1985).

Trapper Mining Inc. operates Trapper Mine, a 2.3 million ton per year surface coal mine in northwest Colorado. Each year Trapper does extensive developmental drilling to delineate coal seams to be mined during the next one to three years. Also, from time to time, Trapper undertakes exploration drilling to evaluate coal reserves for future acquisition. For example, this summer we will drill approximately 60 holes in the development program. The development holes are to a maximum depth of about 160 feet and exploration holes go no deeper than 250 feet. The information gathered through these drilling programs is essential to the economical operation and existence of Trapper.

This proposal, in its present form, would cause Trapper increased costs and time and reduce the value of data from our drilling programs.

We have no major problems with the required written agreements with the well-logging company. We consider this good business practice and require similar language in our drilling contracts. However, it must be pointed out that federal and state environmental agencies which regulate the coal industry would not permit the abandonment of sources such as you suggest for the oil and gas industry.

We suggest that the proposal be amended to exempt coal and other mineral drilling programs to a depth of 1,000 feet. We feel that the proposed requirements represent an unnecessary burden on the industry and will do little to prevent the incidents similar to the five that stimulated this proposal. At depths of less than 1,000 feet, the probability of losing a source is much less than in deeper wells. Likewise, if a source is lost in a shallow hole, fishing and recovery is much less complicated than in deeper holes; the recovery is almost assured. Shallow drilling and logging is much less complicated, and this regulation would only raise costs without an equal increase in safety or environmental protection.

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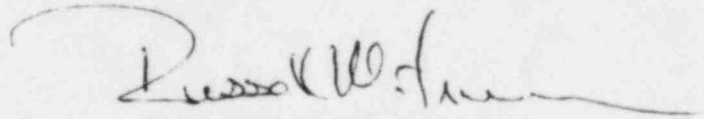
Acknowledgment by mail

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U.S. Nuclear Regulatory Commission
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It is also suggested that the requirement for surface casing be deleted for coal and mineral logging activities. Hole casing is not a common practice as the hole is immediately reclaimed following the logging activity. At the depths we drill, the entire hole would be cased under the proposed regulations. If cased, the resolution of the log would be greatly reduced to the point of destroying the logs usefulness.

We trust that you will consider our comments and accept the suggestion that mineral holes of 1,000 or less be exempt from these rules. Please feel free to contact us if we can supply more information on this important matter.

Best regards,

A handwritten signature in dark ink, appearing to read "Russell W. Frum", with a long, sweeping horizontal line extending to the right.

Russell W. Frum
Asst. Manager of Administration

RWF/mg

cc: J. D. Edgerley
G. M. Stubblefield
W. E. Sowards
E. C. Johnson