

Comments on the 6th PADEP Bituminous Mine Subsidence and Land Conservation Act Report

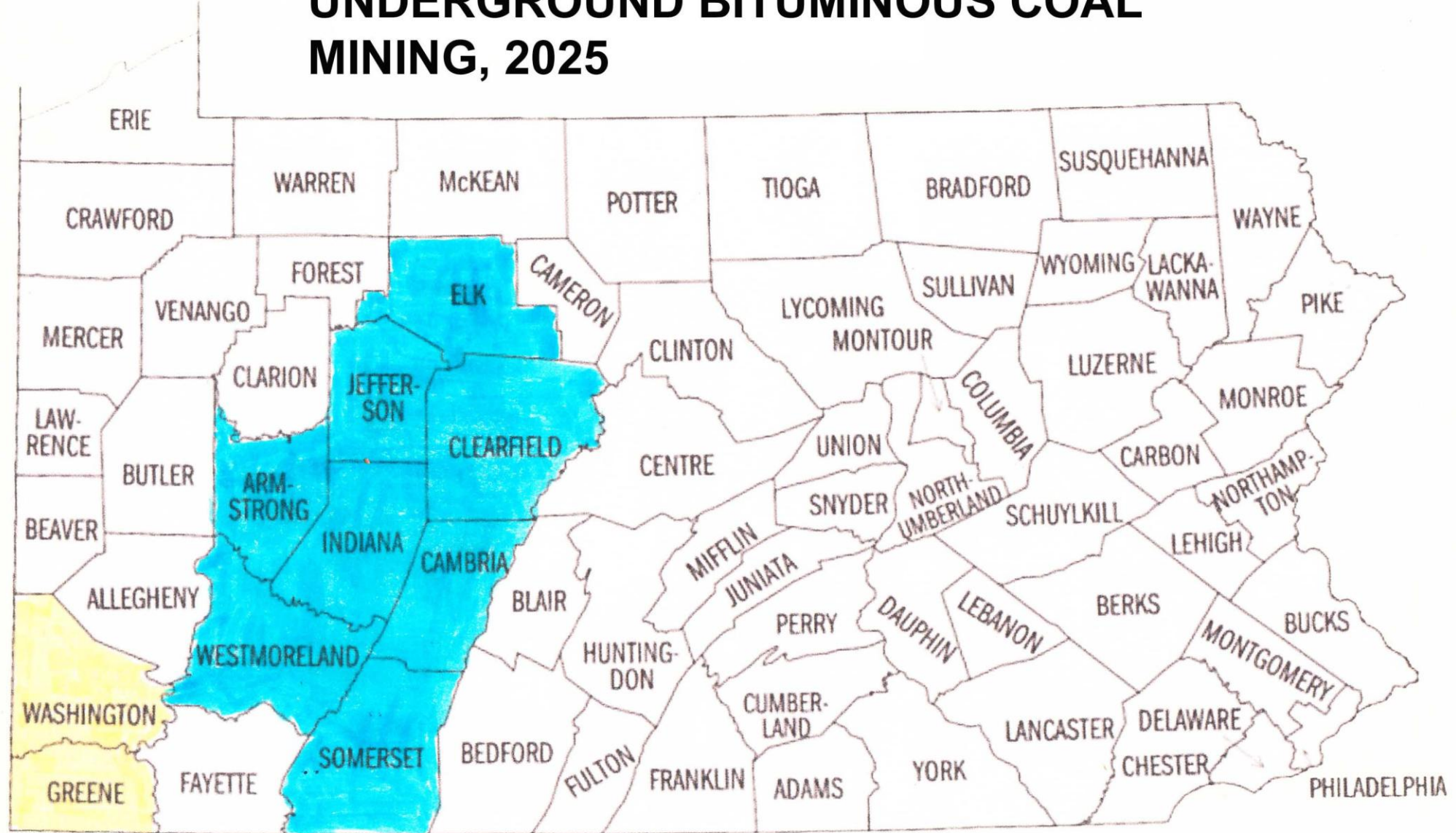
“Act 54” Report on Underground Coal Mining, 2018-2022

Presented to the PADEP Citizens Advisory Council

14 October 2025

by James A. Schmid, Ph. D., on behalf of the Citizens Coal Council of Washington,
Pennsylvania

PENNSYLVANIA COUNTIES WITH UNDERGROUND BITUMINOUS COAL MINING, 2025

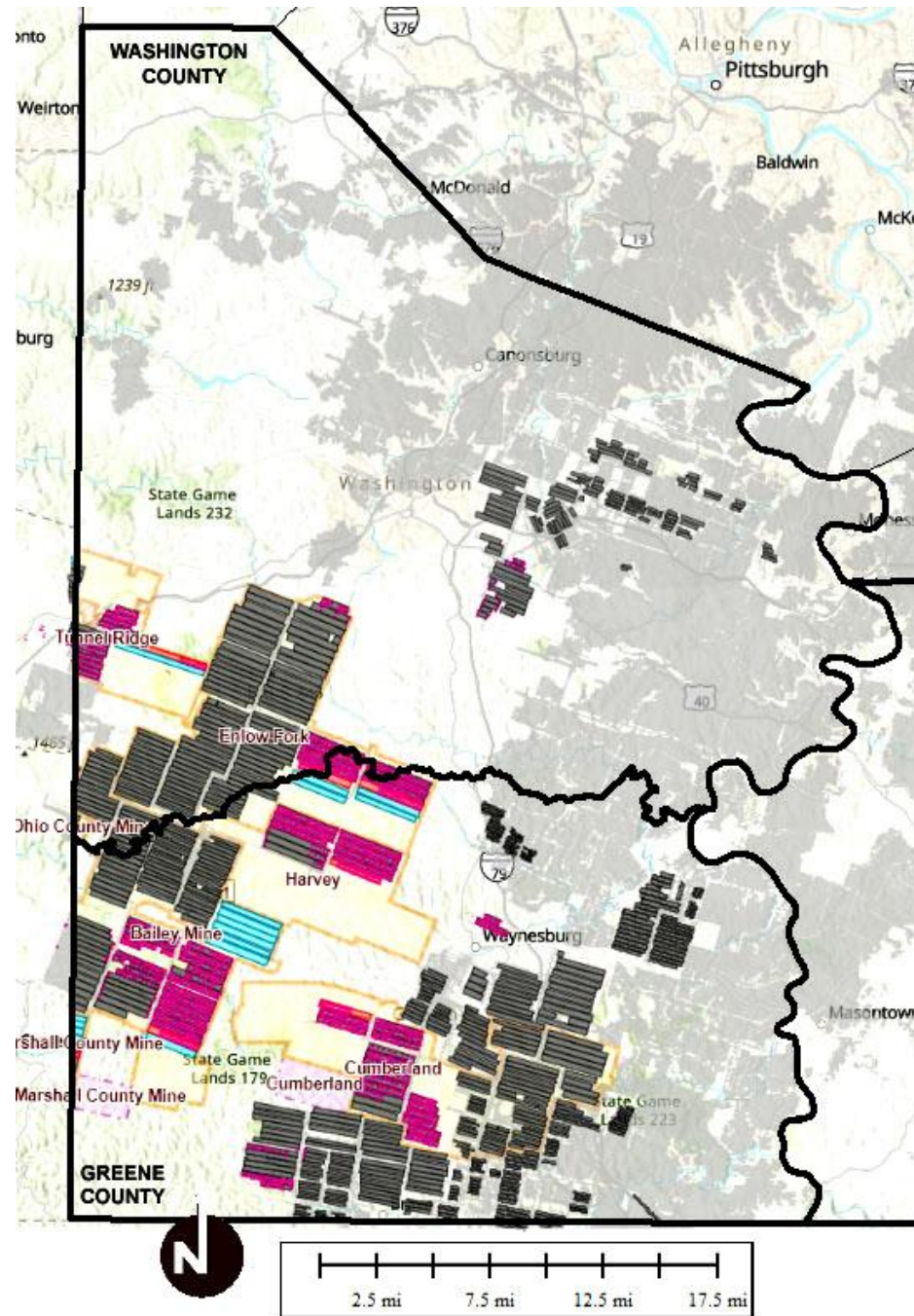


YELLOW = LONGWALL MINING IN USE

APPROVED MINE PERMIT AREAS, 2025

BLACK BARS ARE MINED-OUT
LONGWALL PANELS

PALE GRAY SHADING IS
LEGACY MINED AREAS



NUMBER OF MINES AND ACREAGE UNDERMINED DURING ASSESSMENT PERIOD

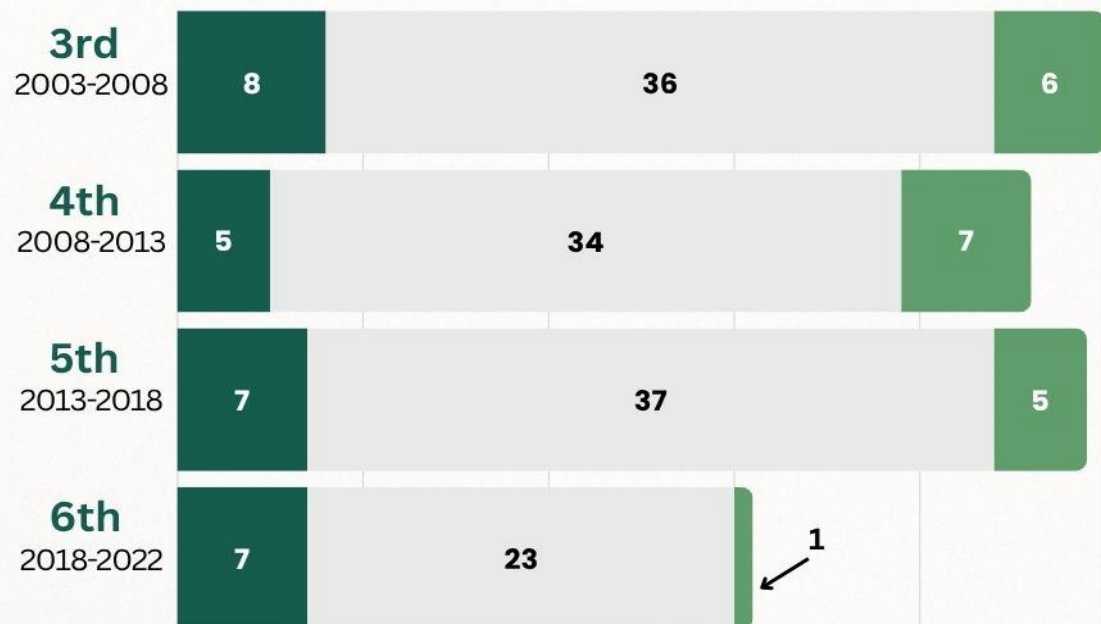
TABLE 1



Data presented below for 3rd through 5th periods were *not mentioned* in the 6th Report, except for the number of mines in the 5th Assessment Period.

Longwall Mine
 Traditional room-and-pillar mine
 Room-and-pillar mine with pillar removal ("full-retreat" mining)

Number of Mines Active During Period



Surface Acres Undermined During Period



MINE-LIABLE IMPACTS DURING ASSESSMENT PERIOD

TABLE 2



Number of mine-liable impacts from active mines by type of mining. Data presented below for 3rd through 5th periods were *not included in 6th Report*.**

■ Longwall Mine
 ■ Traditional room-and-pillar mine
 ■ Room-and-pillar mine with pillar removal ("full-retreat" mining)

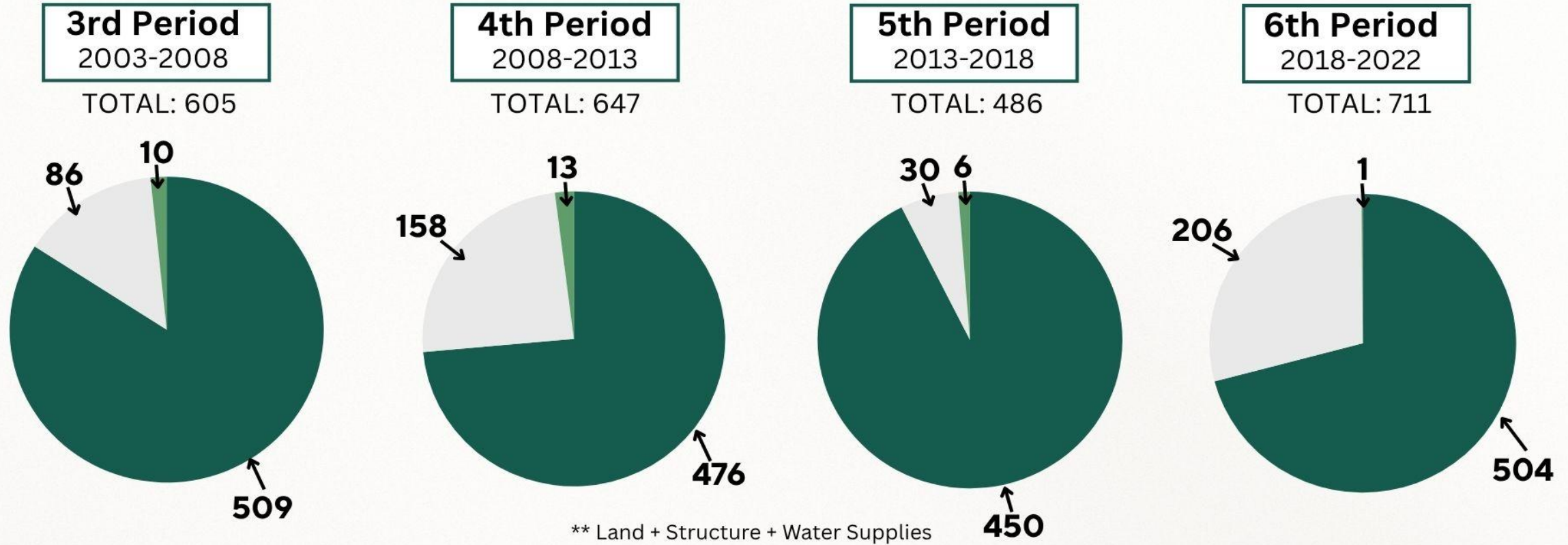


TABLE 3. Status of damage claims reported during the 6th Act 54 Period (2018-2022).

Category	Total Claims	Not Mine-Related*	Unresolved**	Resolved Mine-Related Claims
Structures	455	66 (15%)	129 (28%)	260 (57%)
Water Loss	273	86 (32%)	83 (30%)	104 (38%)
Water Contamination	173	90 (52%)	36 (21%)	47 (27%)
Land	106	16 (15%)	26 (25%)	64 (60%)
TOTAL	1,007	258 (26%)	274 (27%)	475 (47%)

* includes "no liability", "withdrawn", "not covered by BMSCLA", "referred to another Division"

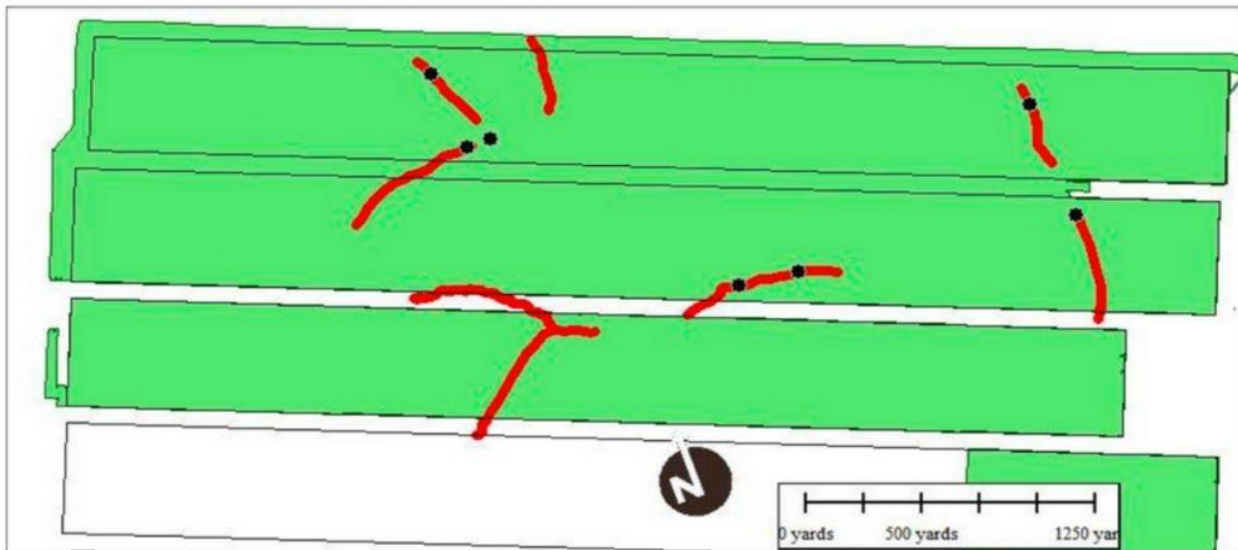
** includes "claim form not returned to DEP", "owner did not respond", or a blank

TABLE 4. Type of resolution for mine-related claims settled during the 6th Act 54 Period (2018-2022). Note that "Repair" represents the smallest category of resolution.

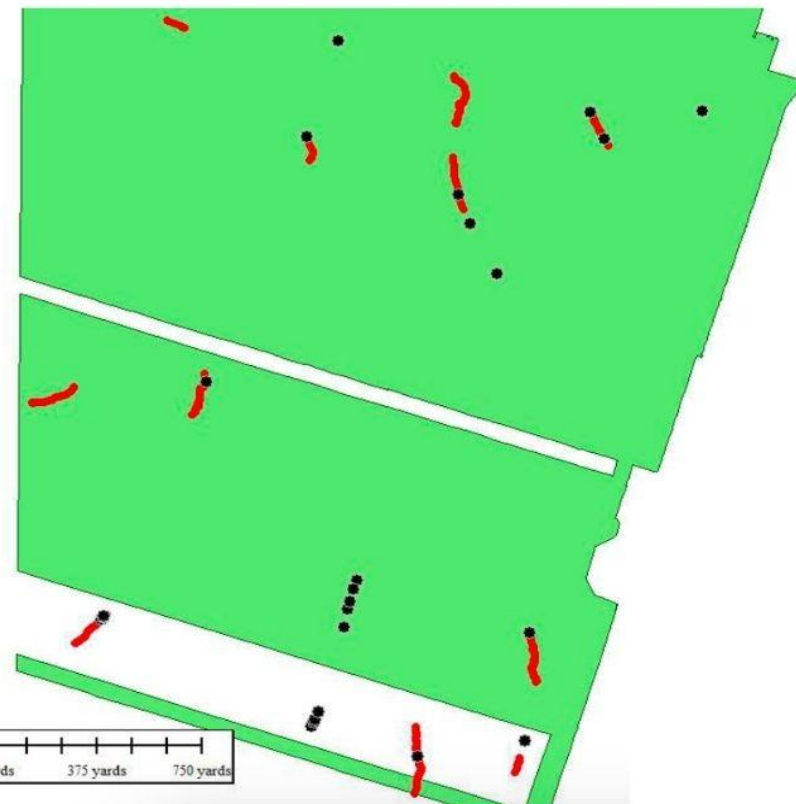
Resolved Category	Mine-Related Claims	Repair	Property Purchase	Agreement	Other/ Misc.**
Structures	260	4 (1.5%)	53 (20%)	194 (75%)	9
Water Loss	104	9* (9%)	6 (6%)	70 (67%)	19
Water Contam.	47	3* (6%)	2 (4%)	28 (60%)	14
Land	64	18 (28%)	13 (20%)	30 (47%)	3
TOTAL	475	34 (7%)	74 (16%)	322 (68%)	45 (9%)

THE DISCONNECT BETWEEN PERMIT INFORMATION AND BUMIS INFORMATION

FIGURE 1



Section of **Harvey Mine** where most of the heaves/fractures occurred within areas of flow loss.



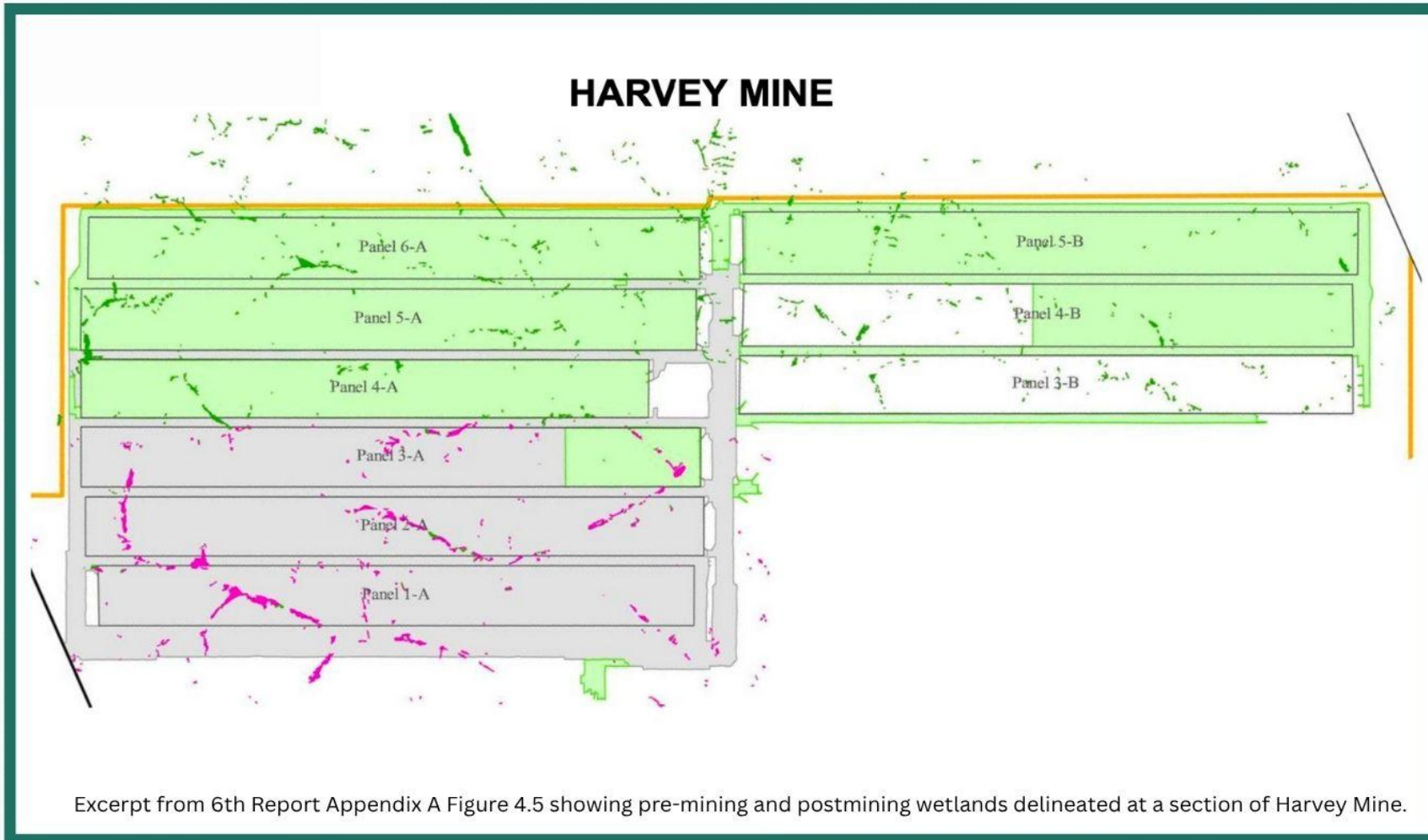
Section of **Tunnel Ridge Mine** where at least 13 instances of heaves/fractures occurred outside of flow loss areas.

- Examples of **heaves/fractures** (black dots on map)
- Examples of **flow loss** (red lines on map)

Source: PADEP GIS shapefiles

FAILURE TO FIELD-CHECK PRE-MINING DELINEATIONS OR REPORT WETLANDS ACCURATELY

FIGURE 2



-  Longwall panels mined during the 6th period
-  Longwall panels mined prior to the 6th period
-  Areas not yet mined
-  Post-Mining Wetlands
-  Pre-Mining Wetlands

Only 1.74 acres of post-mining wetlands (purple) are above areas mined during the 6th period, not the 33.38 acres listed in Table 15.

FAILURE TO FIELD-CHECK PRE-MINING DELINEATIONS OR REPORT WETLANDS ACCURATELY

FIGURE 3



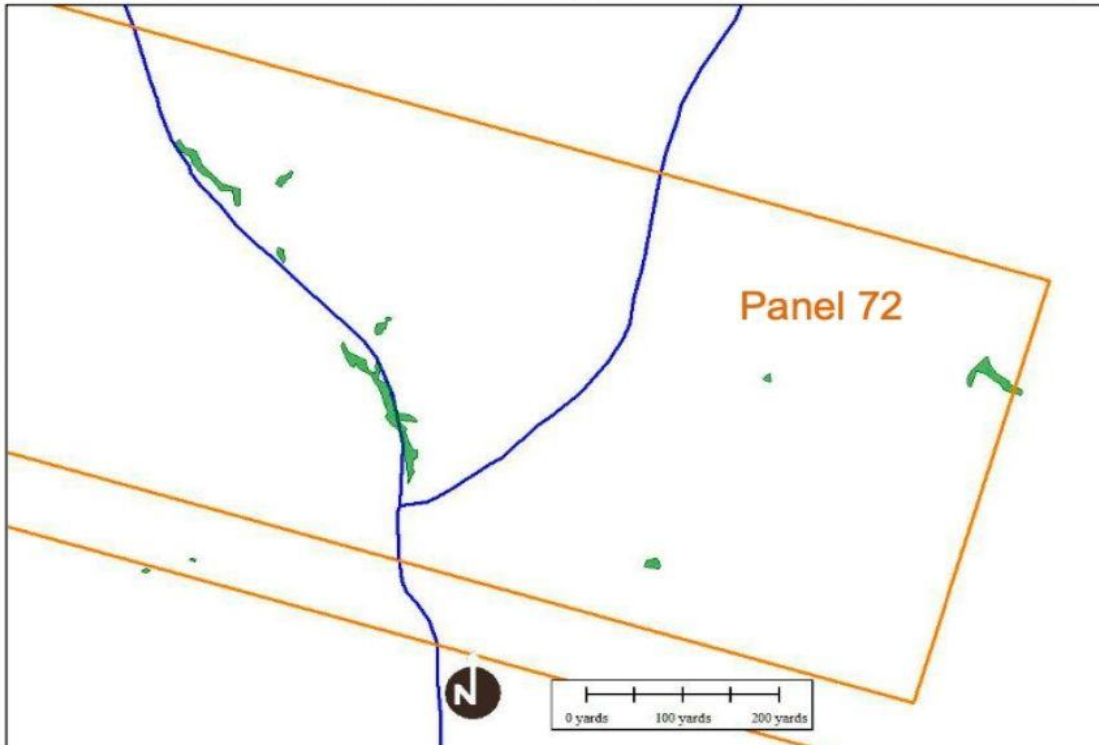
Pre-mining wetlands



Post-mining wetlands

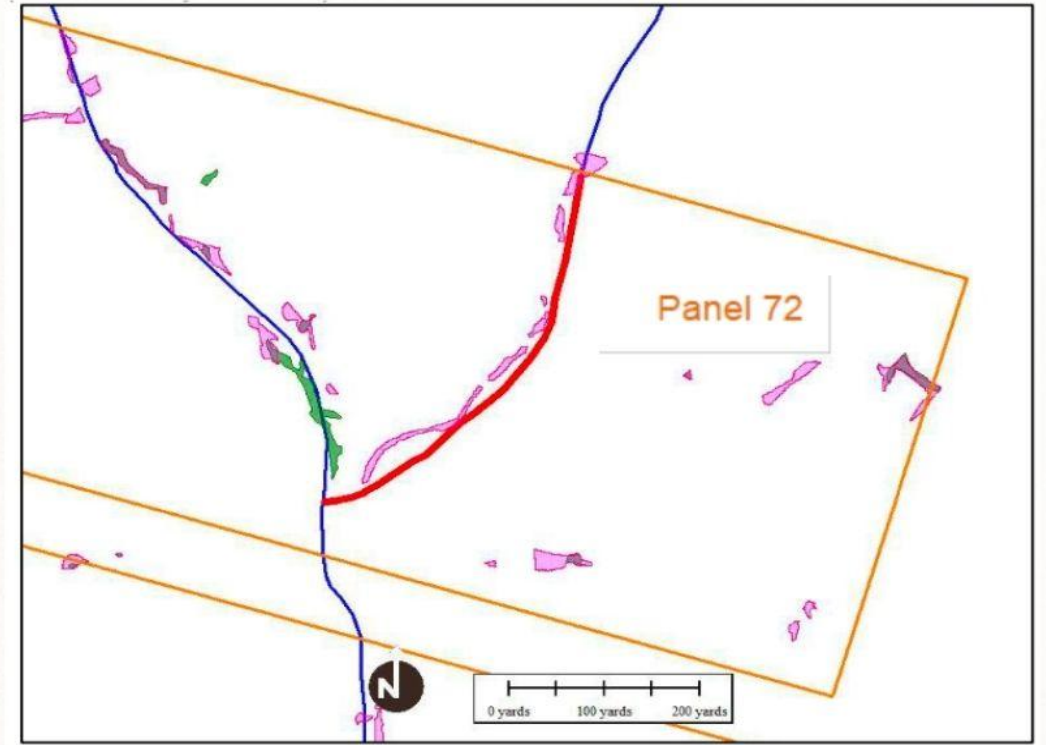
PRE-MINING

No wetlands at all delineated along stream to the east



POST-MINING

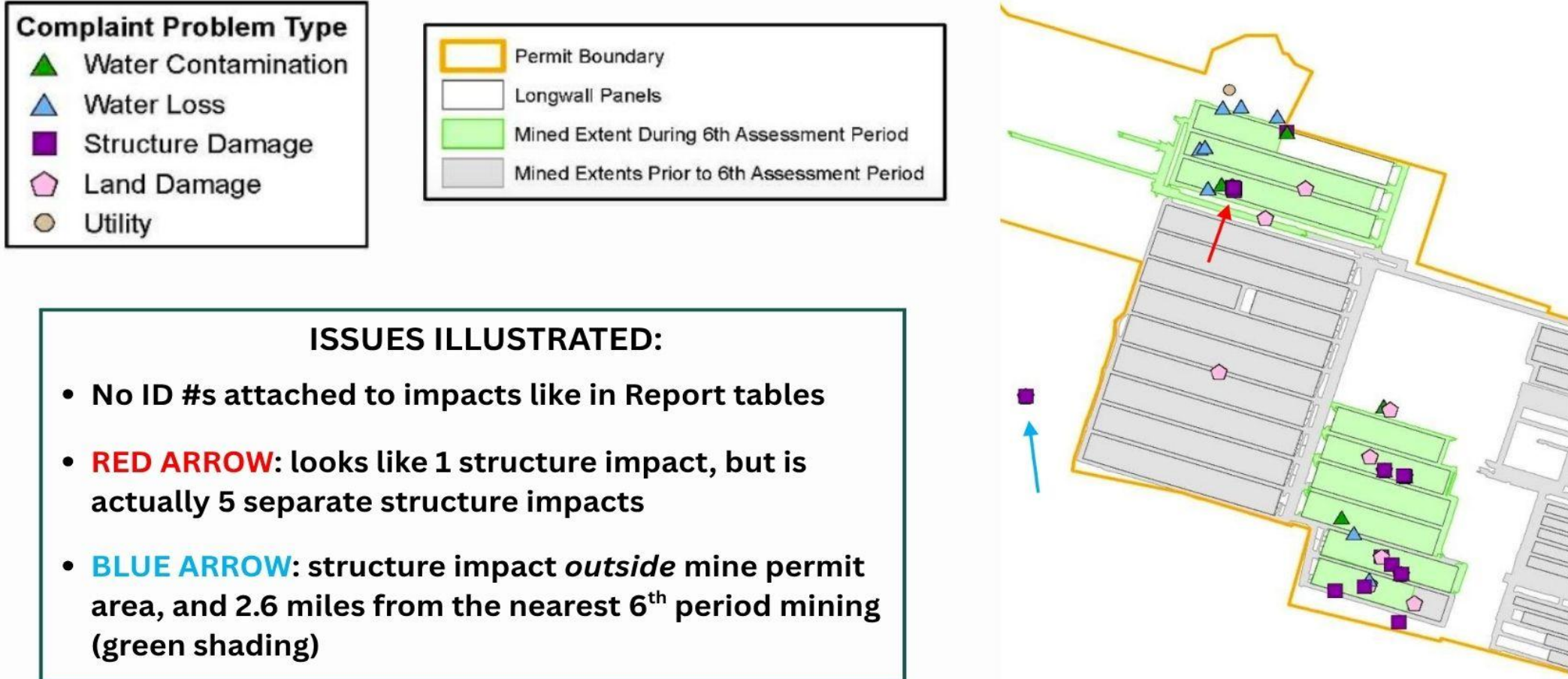
Many wetlands delineated along the stream to the east, which experienced flow loss due to mining (indicated by red line).



Comparison of pre-mining and post-mining wetland delineations in a section of Cumberland Mine Panel 72 undermined in 2022 during the 6th Act 54 Period.

LITTLE RELIABLE OR VERIFIABLE EVIDENCE FOR THE REPAIR AND RECOVERY AFTER UNDERGROUND MINING

FIGURE 4



Excerpt from Appendix A Figure 2.2 “Complaints – Cumberland Mine”.

APPROVED MINE PERMIT AREAS, 2025

BLACK BARS ARE MINED-OUT
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