

V. Hamner

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Manti-LaSal National Forest
350 East Main Street
Price, Utah 84501

2800

December 31, 1979

U.S. Department of Interior
Office of Surface Mining
Reclamation and Enforcement
Brooks Tower Second Floor
1020 15th Street
Denver, Colorado 80202

Valley Camp Coal Co.

Attention: Mr. John Nadolski

Dear Mr. Nadolski:

We have reviewed the subsidence and hydrologic monitoring plans submitted by Valley Camp Coal Co. for their Belina Mine. The plans seem to contain all of the essential elements required by the Forest Service. The Forest Service concurs to the approval of these plans provided the following concerns can be met.

1. Baseline data inventories are made available for review and comment and are approved by the Forest Service. We recognize that this inventory is a continuing process and that all data will not be collected prior to approval of this plan. We would like the plan to commit the operator to at least annual reviews of these data.
2. We are concerned with the follow through of data collection and the maintenance of monitor points and equipment.
3. We are concerned about the method of data collection and the reliability of that data. Not everyone is qualified to collect data. It must be done professionally.
4. We are concerned about how the data will be displayed. A significant part of the requirement of a monitor plan which seems not to be stressed are the requirements for displaying of the data, both the inventory data and the monitoring data. Appropriate data displays, such as maps, charts, tables, overlays and narrative descriptions are essential to the success of the program. Data collected and filed are of no value and often cannot be later evaluated unless properly recorded and documented. All maps both surface and subsurface should be on the same scale so they can be superimposed one upon the other. Maps as presented in this document are not of a scale suitable for presentation and evaluation of the data.

5. The Forest monitor plan guide specifies that the requirements for monitoring and the designation of points to be monitored will be done using the baseline inventory data, and will be by coordination of the operator, Forest Service USGS and OSM. To my knowledge this has not been done. Here again the base inventory data must be displayed in a way that such decisions can be made. We have not seen a complete display of all the necessary data.

We feel it essential to meet with Valley Camp and review their inventory data.

Sincerely,


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REED C. CHRISTENSEN
Forest Supervisor

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