



United States
Department of
Agriculture

Forest
Service

Manti-LaSal
National Forest

599 West Price River Drive
Price, Utah 84501

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**DIVISION OF
OH, GAS & MINING**

Ms. Sarah Bransom
OSM - Reclamation and Enforcement
Brooks Towers - 1020 15th Street
Denver, Colorado 80202

Dear Ms. Bransom:

We received the Mining and Reclamation Plan (MRP) for Valley Camp's Belina and Utah No. 2 mine complex in March of 1981. Our first review comments were submitted to OSM in June of 1981. Some of the questions, comments, and deficiencies identified were answered to our satisfaction, others were apparently disregarded. Also, during the interim, we have been asked to respond to many proposed changes to the MRP. We believe the following list of comments is our consolidated response for unresolved items from the 1981 MRP and the many changes through those in December 1983, January 1984, and including the most recent February 1, 1984 request.

Comments Volume I

"Valley Camp, Inc., is conducting underground coal mining operations on the subject lands pursuant to mine permit number ACT/007/014 for Utah No. 2 mine, and ACT/007/001 for Belina No. 1 mine, both issued by the State of Utah.

The Belina No. 2 mine commenced coal production after the mine plan was published in 1981. It is recommended that the State number for the Belina No. 2 be added for completeness.

Comments Volume II

783.16, Page 34

"The Utah Division of Health has classified all water in the Valley Camp, Inc., mine plan area as 1C, 2B, 3A, and 4."

A map which shows and/or a narrative which describes the specific waters classified as 1C, 2B, 3A, and 4 is needed.

Comments Volume III

"If unstable or potentially unstable conditions exist, corrective measures will be taken immediately."

2.
DOH
or
DWR



The following should be added to the above statement to make it complete, "and the appropriate agencies will be notified".

784.13, Page 24

"The roads, parking areas, and all other areas not regraded will be scarified, fertilized, and covered with topsoil."

Areas disturbed during mine development must be adequately reclaimed unless acceptable use and appropriate maintenance is assured ("and revegetated" needs to be added to the list of treatment measures).

784.13, Page 27

"Any areas not achieving 80% of the original cover in the first five years should be re-evaluated and another attempt made to successfully vegetate those areas."

Suggest the statement could be rewritten as follows: "Any disturbed and revegetated areas not achieving 80% ground cover in the first five years will be revegetated until an acceptable ground cover is established".

784.13, Page 29

"When the reclaim tunnel is full, the end and top openings will then be sealed with concrete."

*where ?
disposal
waste* Provisions for excess waste disposal sites need to be made in the event the reclaim tunnel cannot provide sufficient storage for all the intended waste.

784.13, Page 28

"The private road from Eccles Canyon on the mine site will be left. This will allow access to the reclaimed area for camping, recreation, or whatever alternative use the surface landowner may desire."

784.14, Page 31

ok "The general office-warehouse area. This area has potential value as a campsite or recreational area. Valley Camp would, therefore, first propose to leave the buildings, parking lot, entrance road, etc., in the office-warehouse area in tact and dispose of the entire complex for use as a recreation site or other usage."

The road and general office-warehouse area have limited, if any, potential for use as recreational sites or for other usage, and could result in a variety of problems.

These disturbed areas must have provisions that require they be adequately reclaimed to protect on-site, adjacent, and downstream values if acceptable uses do not materialize.

784.20, Page 83

"The only structures which could be damaged if subsidence occurs are gas pipelines."

In addition to the gas pipelines, there are roads, power and telephone lines, and fences which could be damaged by subsidence and should be listed. Refer to the lease stipulations. *applicant should commit to repair or replace damaged structures*

Comments Volume IV

* The 1981 subsidence base map needs to be replaced with the 1983 revision. *1983 subsidence map*

OSM map

A geologic map is needed which shows the springs and seeps, along with fault locations as outlined in the subsidence and hydrologic monitoring program. The geologic map should be at the same scale as the other resource data layers.

Comments Volume VI

Appendix C

"Subsidence Control Monitoring Program."

Replace the 1979 Cooperative Agreement with the September 25, 1981, Collection Agreement.

784.15-5, Appendix M, Phase 4

Paragraph one, item (2) should be changed to read, "beneficial mycorrhiza and micro-organisms".

in TA

The U.D.W.R. comments on pond benefits are not included, but probably should be.

not in this permit term

784.21

The U.D.W.R. comments on the compatibility of deer and conveyor belts is not included, but probably should be.

817.106

"All rills or gullies over nine inches deep occurring in regraded areas will be filled, graded, or otherwise stabilized and reseeded."

There could be serious erosion problems prior to the rills/gullies becoming nine inches deep. The plan must provide for stabilization or prevention of unacceptable erosion as it occurs.

E.S. condition to approval

Sincerely,

REED C. CHRISTENSEN
Forest Supervisor