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Mine file  
Karen Haddock lth  
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United States  
Department of  
Agriculture

Forest  
Service

Manti-LaSal  
National Forest

599 West Price River Dr.  
Price, Utah 84501

Reply to: 2820

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Lowell Braxton  
State of Utah Natural Resources  
Division of Oil, Gas and Mining  
355 West North Temple  
3 Triad Center, Suite 350  
Salt Lake City, Utah 84180-1203

DIVISION OF  
OIL, GAS & MINING

RE: Five-Year Permit Renewal, Belina Mine, Valley Camp of Utah, ACT/007/001, #2  
Carbon County, Utah

Dear Lowell:

We have reviewed the permit renewal and the Division's May 7, 1990, Technical Deficiency Review and have the following comments:

1. Subsidence Base Map R614-301-728.100a shows numerous ground cracks and sink holes, especially in areas of less than 400 feet of overburden. We are concerned that subsidence impacts have exceeded the level originally predicted in permitting actions.

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A joint UDOGM/BLM/Forest Service and mining company review of the impacts of subsidence seems to be in order to determine the course of action needed for the next 5-year term to mitigate the impacts. We need to analyze the impacts of continued mining and pillar recovery in the areas of shallow overburden. The existing sink holes will need to be backfilled and reclaimed since they pose a potential safety hazard and conduit for routing surface waters underground to the mine workings.

2. Surface Ownership Map R614-301-112.500 shows the Manti-La Sal National Forest boundary incorrectly and does not label National Forest System lands. The private lands shown in section 6, T14S, R7E, lie within the boundary of the Manti-La Sal National Forest. Section 26, T13S, R6E is shown as State land. This is not correct. The lands in this section are National Forest System lands.
3. R614-301-333.0 Thru 301-333.30, Page 69

In the first paragraph on this page it is stated that presubsidence surveys demonstrated that areas for agricultural or silvicultural production of food and fiber, and grazing lands are of such low

production that they can be classified as non-renewable resource lands. This is not correct. National Forest System lands are classified as renewable resource lands and must be protected as such under the mining regulations. Later, in paragraph 6, it is stated that Forest land is classed as a renewable resource and as such, will be afforded maximum protection in order to ensure future productivity. The first paragraph must be revised for consistency.

In paragraph 7 it is stated that the Mountain States Resources natural gas pipelines will be protected or repaired. The pipelines are owned and operated by Questar Pipeline Co. and Mountain Fuel Supply Co. The natural gas pipelines must be identified by the appropriate company name and pipeline designation.

4. R614-301-341. Reclamation Plan

The operator must provide provisions for monitoring subsidence cracks and sink holes, and reclamation, in the event that they are determined to be unsafe and cause unacceptable resource damage. Under the mining regulations, such disruption of the ground surface can be considered disturbed areas incident to underground mining.

5. Premining Land Use Map R614-301-411.100

This map is not complete. It only shows the permit area boundary with no information on land use. This map must be completed to show the premining land uses. It should show the Forest Service livestock grazing allotments and other land use information such as the pipelines, other structures, etc. This map, or another map, should show the current Forest Service management of the mine permit area as designated in the Manti-La Sal National Forest Land and Resource Management Plan (1986). Forest Service management is addressed specific to management units. The permit area contains RNG (emphasis on production of range forage), TBR (emphasis on wood-fiber production and harvest), and UC (utility corridor) management units.

6. R614-301-521.130. Landowners and Right of Entry and Public Interest Maps

See item 2 above.

7. R614-301-521.140. Mine Maps and Permit Area Maps

As stated in the Division's comments (page 10, paragraph 4) in the Technical Deficiency Review, the operator must provide maps of the underground workings and the extent of areas in which planned

subsidence mining methods will be used and which includes all areas where measures will be taken to prevent, control, or minimize subsidence and subsidence-related damage. Please see the comments in item 1 above.

Protection of perennial streams from the effects of subsidence must be addressed.

8. R614-301-525. Subsidence Control Plan

Subsidence Base Map R614-301-728.100a is improperly referenced in the text (page 21) as Map R614-301-525. This needs to be corrected.

Forest Service spring developments, stockponds, roads and trails which lie within the permit area must be identified. The operator must make a commitment to repair any subsidence damage to other facilities in the same manner as has been done on page 22, paragraph 5, for roads.

See items 1 and 3 above.

Protection of perennial streams is addressed under section R614-301-728.100 on page 24 but is not addressed in this section. The subsidence control plan must demonstrate that the perennial drainages will be protected. Section 728.100 calls for first mining only under the perennial drainages. The Forest Service will not consent to any mining beneath perennial drainages, such as the South Fork of Eccles Creek, on National Forest System lands unless it can be demonstrated that mining will not induce subsidence during the life of the mine and after the mine is abandoned.

As required by lease stipulations, the operator must implement a vegetation community monitoring program over the permit area in conjunction with the subsidence monitoring plan to identify impacts to vegetation. Color infrared photographs were taken for this purpose every other year since 1980. Valley Camp needs to provide information on the alteration of vegetative communities from subsidence at time intervals not to exceed five years, corresponding with the five-year permit renewals. A monitoring plan must be completed and discussed in the plan. Even though color infrared (CIR) photography is not required, we believe that CIR photo monitoring at five-year intervals, using an adequate scale, is the most efficient and economical method.

The photogrammetric subsidence monitoring program is discussed but more detail is needed. The scale of photography to be taken must be discussed to demonstrate that the indicated accuracy can be obtained. In addition, it is important to make sure that an adequate number of subsidence monuments are placed outside of the potential subsidence areas to serve as reference for the program. In addition, monuments which will be subjected to subsidence must be surveyed each year prior to the photography to provide adequate photogrammetric control.

The subsidence monitoring program must continue until such time as subsidence has been determined to be substantially complete in any given mined area or until the end of the reclamation liability period.

The operator must provide information on where subsidence cracking and sink holes are expected to develop over the mine workings, based on the characteristics of the overburden, mine method, and thickness of overburden. This information is necessary to determine what impacts are likely to occur to resources.

9. R614-301-623.200. Detailed Geologic Information

As stated on page 39, paragraph 2, of the Technical Deficiency Review, the maps do not give sufficient detail to assess the impacts to hydrology from mining and subsidence.

10. R614-301-632. Subsidence Control

See item 8 above.

11. R614-301-700. Hydrology

We agree with the Division's determination that the hydrology section and PHC are not adequate. The impacts which have already occurred are not adequately addressed. The Forest Service has not received any of the water monitoring reports submitted by Valley Camp to the Division. We will need a copy of the last annual report to adequately evaluate the 5-year renewal.

12. R614-301-722.100b.

The 1978 and 1979 spring and seep inventory conducted by Vaughn Hansen is discussed. The locations of all of the springs must be shown on a geologic map to display the ground water situation and the Vaughn Hansen report must be included in the appendix. At the present time, only the springs being monitored are shown on the maps. As discussed by the Division in the Technical Deficiency Review, a new spring and seep inventory is required prior to the 5-year renewal.

Developed springs and the uses of the inventoried springs must be addressed. The spring monitoring program must be expanded to include developed springs and springs which involve pending or existing water rights. If the flow in these springs is diminished by mining, the operator must commit to replacing this water by developing adjacent springs or replacing the water by some other acceptable means. The water rights inventory needs to be updated.

Spring monitoring station S-1 was dropped from the monitoring program without any indication of the reason. This spring must be monitored until such time as it is determined that monitoring is no longer necessary based on information provided by the operator.

The water data tables need to be revised to show the units of measure.

13. R614-301-724.411.

There is no reference to the precipitation gage which the Forest Service requested be installed at the mine site in 1981 (Section 784.14, page 46, of the existing plan).

14. R614-301-728.100

The operator has identified that there is potential for a transbasin diversion of water between the Huntington Creek and Mud Creek basins. The operator states that it has not been determined which basin will receive water at the expense of the other. A study must be completed so that this impact can be predicted, with estimates of the impact to flow for each of the basins. Based on the results of the study, measures need to be investigated for implementation to mitigate this impact.

If you have any questions, please contact the Forest Supervisor's Office in Price, Utah.

Sincerely,



for  
GEORGE A. MORRIS  
Forest Supervisor