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Original 007/001 #2
cc: D. Haddock
R. Summers
L. Braxton

United States Department of Agriculture | Forest Service | Manti-La Sal National Forest | 599 West Price River Dr. Price, Utah 84501

Reply to: 2820

Date: February 6, 1992

Roger Zortman
Bureau of Land Management
Moab District
P.O. Box 970
Moab, Utah 84532

Dear Mr. Zortman:

This letter is a follow-up to our meeting with Gary Johnson and Ebe Elias on January 13, 1992, in regard to coal mining by Valley Camp of Utah, Inc. in the vicinity of Boardinghouse Canyon.

The Forest Service and Utah Division of Oil, Gas and Mining have reviewed hydrologic monitoring information for Boardinghouse Creek. Monitoring stations include surface water monitoring station VC-11 and spring S36-17. Spring S36-17 is located on the slope just above Boardinghouse Creek in the mined area. Station VC-11 is a stream monitoring station located in Boardinghouse Creek, just above the confluence with Mud Creek. Flows at both locations have been continually recorded. Since monitoring data shows perennial flow at S36-17, one of many springs in the area that contribute flow to Boardinghouse Creek, and since the flow of Boardinghouse Creek is perennial at VC-11, it can be concluded that Boardinghouse Creek is perennial.

Perennial flows and surface resource production on National Forest System lands must be preserved consistent with the Surface Mining Control and Reclamation Act, the Coal Mining Regulations, the Manti-La Sal National Forest Land and Resource Management Plan, and lease stipulations. With overburden thickness less than 500 feet and double-pass room-and-pillar mining, we are concerned about potential uneven subsidence and disruption of the ground surface, including water flow in Boardinghouse Creek.

Your letter to Valley Camp of Utah, Inc., dated October 29, 1991, concluded that a 250 ft. buffer zone on both sides of the stream, where bottom coal recovery would not be permitted, would be required to protect Boardinghouse Creek. In our meeting, we understood that you have determined that conventional room-and-pillar mining (single-pass only, with 80' by 80' pillars), without pillar recovery, could be allowed without impacting the drainage. Please clarify which mining scenario is being recommended and advise us of what long-term effects to Boardinghouse Creek are anticipated.

We also discussed mining in the remainder of the lease area and the potential for double-pass mining (with no pillar recovery) to cause disruption of the ground surface. As agreed, we reviewed your October 29, 1991 letter to Valley Camp to determine if the potential for plug-type subsidence was addressed. We found that it was not.

The Office of Surface Mining, Albuquerque Office, stated (Technical Report, Potential Subsidence Impacts - Belina Mine, Valley Camp of Utah, ACT/007/001, Carbon County, Utah, December 5, 1991) that sinkholes have been known to develop from mining in areas with overburden depths as great as 450 feet.

Lease stipulations preclude mining that would result in surface subsidence that causes hazardous conditions, or damages flow in perennial streams on National Forest System lands. Mining operations which result in sinkholes or plug-type subsidence are not consistent with this requirement.

Please evaluate the potential for disruption of water flow and the ground surface (especially plug-type subsidence) in the permit area under the current mine plan and advise us of your findings. We feel that empirical data would be required to substantiate the results of geotechnical calculations.

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

Sincerely,

/s/AaronL.Howe
for
GEORGE A. MORRIS
Forest Supervisor

cc: D-3
UDOGM
BLM, Price