United States
Department of
Agriculture

Forest
Service

Manti-La Sal
National Forest

599 West Price River Dr.
Price, Utah 84501

RECEIVED
JUN - 8 1994
DIV. OF OIL, GAS & MINING

Reply to: 2820

Date: June 2, 1994

Utah Coal Regulatory Program
Division of Oil, Gas and Mining
ATTN: Pamela Grubaugh-Littig
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

ACT/007/001 #2
Copy PKM (all)
(Aaron) (all)

Dear Ms. Littig:

In our letter of December 9, 1993 regarding the Valley Camp, Belina Mine, presently operated by White Oak Mining and Construction Company (copy enclosed), we identified several concerns that need to be evaluated and addressed. The present mining method (room-and-pillar, double-pass) has caused the development of "pit or chimney" type subsidence in areas of low overburden (less than 500 feet). This type of subsidence and the related impacts were not anticipated when the mine plan was approved and Forest Service consent was given. Based on inspection of the two areas on the Forest where pits have developed, we have determined that pit or chimney type subsidence could cause hazardous conditions and functional impairment of land uses and must, therefore, be prevented. We object to the continuation of mining on National Forest System lands by methods that can result in chimney subsidence features such as pits or waffle iron type landscapes. In addition, subsidence of perennial drainages (James and Boardinghouse Creeks) could cause unacceptable surface water impacts.

While we have not received a response from either UDOGM, BLM, or the mine operator concerning the issues raised, we continue to see coal being hauled from the permit area. Please advise us as to the status of mining on National Forest System lands and how our concerns are being addressed.

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

Sincerely,

Aaron L Hone
for
GEORGE A. MORRIS
Forest Supervisor's Office

Enclosures

cc:
BLM, Moab District
BLM, Price Coal Office
Richard Holbrook, OSMRE, Denver, Colorado

United States
Department of
Agriculture

Forest
Service

Manti-La Sal
National Forest

599 West Price River Dr.
Price, Utah 84501

Reply to: 2820

Date: December 9, 1993

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

Dear Mr. Braxton:

We reviewed the August, 1993 revision of the Permit Application Package for the Belina Mines operated by Valley Camp of Utah. Our understanding is that the mine is presently being operated by White Oak Mining & Construction Company, Inc. but the permit has not been officially transferred.

During the last 5-year renewal we documented our concerns in regard to deficiencies in the PAP/MRP (letters to UDOGM dated June 8, 1990 and August 27, 1990). Many of the concerns/issues have yet to be resolved:

Subsidence

We identified the potential for the mine plan to cause "plug or chimney" type subsidence on National Forest System lands, considering the mining method (room-and-pillar, double-lift) and areas with shallow overburden. Mining in the Upper O'Connor seam (Belina No. 1) has previously caused at least three instances where chimney subsidence has occurred on National Forest System lands and extensive chimney subsidence on the private lands to the east of the Forest boundary. One of chimney subsidence areas on the Forest resulted in the development of a sinkhole approximately 20 feet square and approximately 20 feet deep. As required by the Forest Service, the sinkhole has been fenced to minimize the hazardous situation for Forest users, livestock, and wildlife. The others have sufficiently healed over time such that they don't pose a significant hazard.

Lease stipulations prohibit mining that would result in hazardous conditions. We object to the continuation of mining that could cause similar features to develop. Such features cause a potential hazard, could prevent continued use of the lands as specified in the Forest Plan and could, therefore, result in functional impairment of specified land uses and surface resources.

On Page 500-20, the March 1991 report prepared by Kenneth C. Ko & Associates entitled "Subsidence Potential over Two-Seam Developments" is referenced. In accordance with the results of this report, the operator has stated that operations will maintain a minimum of 200 feet of overburden to prevent "Plug" type subsidence under full seam recovery. We seriously question the results of the report and the adequacy of this method of preventing this type of subsidence. Monitoring of previously mined areas within the permit area has demonstrated that double-pass mining has caused sinkholes to occur in areas with overburden depth that exceeds 400 feet.

Subsidence Base Map 728.100a shows a 250 foot buffer zone of first mining only for the purpose of protecting the lower reaches of Boardinghouse Creek from subsidence. A survey will be required to establish at what point the the creek and it's tributaries are perennial. Protection from subsidence will be required for the perennial sections of the stream. In addition, the Forest objects to any additional mining within this buffer zone until we receive advice from the Division of Oil, Gas and Mining and BLM that this would be adequate to protect the creek from subsidence for the long-term (centuries) considering such conditions as oxidation of the pillars with time by exposure to air or water.

James Canyon Creek is identified in the PAP as being perennial and supports a fishery. The mine plan shows that the upper reaches of the drainage would be mined but the text on page 300-3 states that James Canyon will probably not be impacted. It also states that it will be monitored if impacted. If not monitored it would not be possible to determine if impacts occur. James Canyon Creek is being monitored by the Forest Service as control for monitoring impacts from mining under Burnout Creek by the Skyline Mine. Mining under James Canyon could potentially impact the drainage and conflict with the study. The drainage needs to be identified for protection, and monitoring needs to be initiated and coordinated with the Forest Service.

In the revised PAP, there are no plans to conduct subsidence monitoring other than ground surveys to detect any obvious subsidence features. In the original PAP submitted in 1990 for the 5-Year Renewal the operator proposed to continue subsidence by photogrammetric methods. Lease stipulations require subsidence monitoring sufficient to detect and quantify subsidence. Whether a conventional survey or photogrammetric methods are selected by the operator, the subsidence monitoring plan needs to be updated to include an adequate system of monuments to determine the amount of subsidence that occurs over each mined area and to determine the angle-of-draw. Before the Forest Service will consent to the relinquishment of any Federal coal leases, the operator will be required to demonstrate, through monitoring, that subsidence is substantially complete. On page 500-20 it is stated that monitoring will continue for 5 years following reclamation. This may not be adequate for determining that subsidence is substantially complete. The operator should commit to monitoring until it can be determined that subsidence and impacts to the hydrology and vegetation are substantially complete.

On page 500-21, methods for replacement of water in the event that losses of water occur are discussed. The operator must state that any methods for replacement of water are subject to approval of the regulatory authority with consent of the appropriate surface and water-rights owner. In addition, the operator will be required to and must commit to fencing, recontouring and complete reclamation of any sinkholes, cracks, or other hazardous conditions.

Land Use

The Land-Use section and Map 301-411.100 need to be revised to reference the Land and Resource Management Plan, Manti-La Sal National Forest, 1986 and discuss specific Forest Service Management Areas and land-use prescriptions. Forest Service management prescriptions are addressed specific to management units. The permit area contains RNG (emphasis on production of forage for livestock and wildlife), TBR (emphasis on wood-fiber production), and UC (utility corridor) management units.

Vegetation

Lease stipulations require monitoring of subsidence, hydrology, and vegetation to determine the progressive and final effects of mining. There is no discussion on vegetation monitoring. The operator must commit to vegetation monitoring at five year intervals (should correspond with 5-year renewals) to determine if there have been any mining induced changes to the distribution of vegetation communities in areas that have been affected by mining. We feel that color infrared photography of the mined area at five year intervals with ground sampling to verify on ground conditions would be the most effective and least expensive method of monitoring and would provide a continuous record of conditions at five year intervals.

Since our comments could result in decreasing the amount of coal that could be recovered from the Federal coal leases within the Permit Area, we have forwarded a copy of these comments to the Moab District of the Bureau of Land Management.

If you have any questions or would like to meet with us in regard to our comment, please contact Aaron Howe or Carter Reed at the Forest Supervisor's Office in Price, Utah.

Sincerely,

/s/ Aaron L. Howe

for
GEORGE A. MORRIS
Forest Supervisor

cc:
D-3
C.Reed
Roger Zortman, BLM, Moab District
Tom Rasmussen, BLM, Price Coal Office