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United States Department of the Interior

FISH AND WILDLIFE SERVICE
AREA OFFICE COLORADO-UTAH
1311 FEDERAL BUILDING
125 SOUTH STATE STREET
SALT LAKE CITY, UTAH 84138

December 15, 1982

IN REPLY REFER TO:

Cleon B. Feight, Director
Division of Oil, Gas and Mining
4241 State Office Building
Salt Lake City, Utah 84114

Dear Mr. Feight:

Lynn Kunzler of the Division of Oil, Gas and Mining (DOGM) and Jim Munson of the U.S. Fish and Wildlife Service (FWS) Energy Operations staff attended an onsite review of Price River Coal Company's mine waste disposal plan. On November 11, 1982, they met Mr. Robert Wiley, Environmental Engineer of the Company to discuss the predesign plans and the wildlife conflicts that may arise.

The FWS recommends that the Company inventory the adjacent cliffs in the canyon for nesting raptors. All cliffs within 1 km in line-of-site of the proposed disturbance should be examined. A helicopter survey to locate the nests in May or early June by an experienced raptor biologist would be most effective. Information on location (plotted on a 1:24000 USGS quad map), species, activity and nest condition should be recorded.

* The information from the raptor survey will influence the FWS final recommendations on the waste disposal plan. It is clear, however, that coal waste disposal and reclamation of those sites could be a problem throughout the Uintah Southwestern Utah coal region. The FWS suggests that the feasibility of centralized waste disposal areas be studied. Disposal sites could be located away from cliffs, riparian areas or other essential utilizing access spurs from the Denver and Rio Grande Railroad. This would reduce the reclamation efforts to a few sites and would eliminate the hydrological and reclamation problems of canyon disposal areas.

If the Price River Coal Company proposed disposal area is the selected alternative, the FWS has the following questions:

Where will topsoil for reclamation be obtained? The FWS recommends that the topsoil in the proposed disturbance area be removed and stored for reclamation instead of disturbing another site for topsoil.

Is there adequate information available that demonstrates long rooted, woody species will establish themselves on six inches of topsoil over coal waste material? Should the coal waste be crushed to a designated size to support root growth and water retention? Will toxic leachates retard a plant growth. These potential problems should be fully addressed by the Company before the plan is approved.

Fish Act/007/004

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Denver
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Lynn, EV, Wayne
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JIM

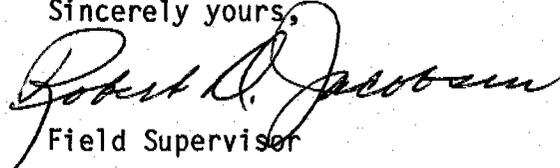
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DIVISION OF
OIL, GAS & MINING

We appreciate the opportunity to comment on the Price River Coal Company's waste disposal plan. If you have any questions regarding our comments, please contact us.

Sincerely yours,


Field Supervisor

cc: DWR, SLC
DWR, Price