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STATE OF UTAH
NATURAL RESOURCES & ENERGY
Wildlife Resources

1596 West North Temple • Salt Lake City, UT 84116 • 801-533-9333

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Copy to John
Scott M. Matheson, Governor
Temple A. Reynolds, Executive Director
Douglas F. Day, Division Director

May 17, 1983

Mr. Jim Shirazi, Director
Utah Division of Oil, Gas and Mining
4241 State Office Building
Salt Lake City, UT 84114

Attention: Lynn Kunzler

Dear Jim:

Rob Wiley of Price River Coal Company recently requested input from our Southeastern Regional office concerning adequacy of wildlife information or need for further study relative to their Price River Coal Company complex dealing with Waste Rock Disposal Areas, New Man Entries and New Air Breakouts. Specifically, Mr. Wiley inquired concerning the company's tentative plans to expand the existing Schoolhouse Canyon refuse (waste rock) area, development of yet another refuse area upon abandonment of Schoolhouse Canyon (either Gentile, Bear, Barn or Redpole Canyons), development of two-man/equipment entries (Robinson Gulch and Willow Creek) and vertical air breakouts to be established from outside the mine in Dry Canyon. As explained by Mr. Wiley, none of these activities will be initiated in the near future and some not until after the year 2000. As you well know, these future projects are dependent upon market conditions and could materialize more quickly or be significantly delayed in relation to projected time tables. However, their current in-house planning is such that the company is now desirous of a "life of mine" permit.

The following summarizes the Division's understanding of each project:

Schoolhouse Canyon Waste Rock Disposal Area

Generally speaking, the existing refuse disposal area in Schoolhouse Canyon has been filled to just less than one fourth of its capacity and has been in operation since 1976. The company's projections for coal production have fallen substantially short of expectations. This coupled with the current depression demonstrates that the existing refuse area will be useful for several more years, possibly until around 1990. The company's planned expansion would raise the waste rock area a maximum of 200 feet in elevation and extend it nearly 1,200 feet up the canyon. This activity would not be initiated until the currently approved area is filled to capacity. Deposition of refuse in the expanded area could occur over a period of 7 to 15 years. Truck haulage (50 ton capacity) is the current and planned future method for transportation of the waste rock.

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Alternative Waste Disposal Areas When the Expanded Schoolhouse Canyon Area is Filled

The company has suggested four alternative canyons for waste rock disposal once Schoolhouse Canyon is abandoned--Gentile, Bear, Barn or Redpole (first drainage on the right as you proceed north on Highway 33 past UP&L's Carbon Power Plant). Development of one of these sites would not be anticipated prior to the year 2000. The company has indicated the Redpole Canyon on a preliminary basis would best meet their needs. If Redpole Canyon is selected, waste rock would be conveyed ~~underground~~ and out of the proposed Willow Creek portal, over Highway 33 and up into the canyon. Conveyor or truck haulage could be utilized at any of the other three alternatives; conveyors are preferred by the company.

Willow Creek Portal

This facility would include a man/equipment access and major mine facilities. It would be a renovation of old existing portals in the general area of the complex's now existing Willow Creek storage area along Highway 33. Development is not anticipated prior to 1988.

Robinson Gulch Portal

This facility would be a man access. Construction of a suitable road and staging facilities would be necessary. Development is not anticipated prior to the year 2000.

Dry Canyon Airway

This facility would be two vertical shafts constructed from the outside, thus requiring a road, and would only serve as part of the mine's air system. Development is not anticipated prior to 1990.

Wildlife Surveys

In regards to a need for additional wildlife studies, it is recommended that surveys for high interest species and their high valued habitats be conducted in the appropriate season immediately preceding development associated with any new facility. The expansion of the waste disposal area in Schoolhouse Canyon will be a "creeping" type of impact and may not truly represent a new disturbance. Similarly, development of the Willow Creek portal facilities in an area that parallels Highway 33 and is now utilized for storage may not truly represent new disturbance. Therefore, the need for wildlife studies in these two areas should be more closely scrutinized in the year immediately preceding development. In regard to needed study at the other facilities, it is again premature to outline probable impacts, study goals, and techniques because the projects are several years away from initiation. Studies, when needed, should be conducted in the appropriate season immediately preceding initiation of the company's development.

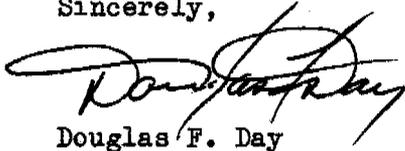
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A cursory review of the alternative sites for waste rock disposal shows that all have the talus-cliff habitat type. Thus, raptors may be an issue at all sites. Various levels of big game use are recognized at each of the sites. Gentile Canyon is the least desirable for waste rock disposal due to its critical value to wintering elk and deer. Bear Canyon also receives substantial winter use by elk. Today Barn Canyon does not experience significant winter use by big game. But, the elk herd in that area is growing, and by the time waste rock disposal is initiated, winter use by elk will likely be substantial in Barn Canyon. Redpole Canyon does not now experience significant winter use by big game. Its location in relation to other big game use areas is such that it will not likely experience any substantial change in use. Thus, it would probably be the best site. If Redpole Canyon is selected by the company, it would be of value to not expand the Schoolhouse Canyon area, since it has habitat qualities similar to Barn Canyon.

We recognize that our input at this time is general rather than specific. This was necessitated since there are not yet specific plans from the company. We also believe, however, that our input will assist the company in choosing the least environmentally damaging alternative and identify that further study needs are likely at new disturbed sites in the future.

Please convey our consultation to the company.

Sincerely,



Douglas F. Day
Director