

ACT/007/005 ~~Baxter~~  
#2 Mine file  
S. Linna

United States  
Department of  
Agriculture

Forest  
Service

Manti-LaSal  
National Forest

599 West Price River Drive  
Price, Utah 84501

Reply to: 2820

Date: December 17, 1986

Mr. Richard M. Holbrook  
Office of Surface Mining  
Reclamation and Enforcement  
Brooks Towers  
1020 15th Street  
Denver, Colorado 80202

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DIVISION OF  
OIL GAS & MINING

Dear Mr. Holbrook:

The Manti-LaSal National Forest has completed a review of the Coastal States Energy Company's Five-Year Mine Plan Submittal, Skyline Mine, ACT/007/005, Folder No. 2, Carbon County, Utah.

Our overall comment on the Plan is that it is not a complete self-explanatory document as was the original nine volume Mine and Reclamation Plan. The new three volume submittal references the original Plan and/or materials contained therein, as available for review at the mine office. It is our understanding that the new submittal is intended to replace, in total, the original Plan. If this is indeed the case, the referenced documents, letter, maps, etc., must be included in the new submittal to make it complete.

Specific comments on the Five-Year Mine Plan submittal are as follows:

1. Section 2.2.1, Page 2-4

. . . Castlegate Sandstone, the basal member of the Price River Formation  
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According to Doelling, 1972, the Castlegate Sandstone is not the basal member of the Price River Formation but is classified as a separate formation included with the Price River Formation in the Mesaverde Group.

2. Section 2.3.5.1, Page 2-69

The Forest Service Federal reserved water rights claims (minimum instream flows) for Eccles Creek and Huntington Creek filed with the 7th Judicial District Court for Carbon County and the 7th Judicial District Court for Emery County, must be addressed in this section.

3. Section 2.3.6, Page 2-96

The locations of these wells, W13-1 and W17-1, are shown on Plate 2.3.6-1.

These wells are not shown on this plate as referenced.

4. Section 2.4.4, Page 2-116

The number of this section should be changed to 2.4.3.

5. Section 2.5.2, Page 2-119

Since the Blackhawk Formation is saturated above the proposed mine workings, it stands to reason that as subsidence occurs and fractures the shales, more water will be intercepted in the mine workings. Self sealing of the fractures may occur as stated, however, there is no direct information to substantiate this theory. The water inflow and sealing characteristics of the shales should be monitored and reported in the annual summary for subsidence and hydrologic monitoring.

6. Section 2.7.1, Page 2-129

A species list by plant community with a discussion of the methods used in the community analysis were presented in the original Skyline Mining and Reclamation Plan application and are on file at the Skyline Mine Office.

Each version of the Mine Plan should be self explanatory documents. The species list, etc., should be included in the new submittal.

7. Section 2.8, Page 2-134

The limiting factor to spawning success and number of resident trout in Eccles Creek is the amount of water available rather than water quality and habitat available.

The data shown on Table 2.8-3, page 2-146, shows that sediment fines are increasing, degrading, spawning habitat in Eccles Creek. Water quality and spawning habitat are also critical factors. The mine development disturbances and the open coal stockpiles may be partially responsible. Forest officers have observed that effluent from the sediment ponds is often murky.

8. Section 2.8, Page 2-137

Cut-throat trout, according to Utah Division of Wildlife Resources (UDWR) surveys, are increasing in numbers in Huntington Creek above Electric Lake.

This statement is misleading since the numbers decreased during construction. This decrease in population should also be discussed and the present population compared with the pre-existing population.

9. Section 2.8.1, Page 2-139, Paragraph 2

The reference to the Forest Service "USDFS" should be changed to "USDAFS".

10. Section 2.9.1, Page 2-149

Mammals, amphibians, reptiles, and raptors are listed. There is no species list of small birds found in the lease area. Several birds found in the lease area are game species and some are classified as high interest species. Birds need to be included.

11. Section 2.9.4, Page 2-170

Subsidence could alter ground water flow and vegetation. These changes or resulting trends could also alter wildlife habitat. This possibility must be brought out in the discussion.

12. Section 2.11, Page 2-183

The maps of soil/plant associations, the vegetation and soils report, and other referenced soil maps submitted in the original application should also be included in the new submittal.

13. Section 2.12.2, Page 2-200 and 201

The Manti-LaSal National Forest Final Environmental Impact Statement (FEIS) and Land and Resource Management Plan (LRMP) have been published and distributed to the general public. These documents supersede the Ferron-Price Land Management Plan.

14. Section 2.12.2, Page 2-204

To date, there are no known archeological or paleontological sites within the proposed disturbed areas.

The archeological and paleontological survey report should be cited and included in the appendix for reference. This statement must be supported.

15. Section 3.1.5, Page 3-9

This section discusses storage of underground wastes, excess surface spoil, or coal processing wastes in underground workings. If potentially contaminating materials are temporarily stored underground, a plan including provisions for proper temporary containment of such materials must be reviewed for approval by the regulating agencies. Permanent storage of contaminating materials underground may not be allowed. This discussion needs clarification so that it can be determined what exactly is proposed.

16. Section 3.2.1, Page 3-18

After infiltration, the surface runoff is estimated at 5.10 inches.

5.10 inches is apparently a typo. It should be 1.50 inches.

17. Section 3.2.3, Page 3-23

Open storage of coal in this area was not approved by the Forest Service and may be responsible, in part, for the increasing sediment fires in Eccles Creek.

It is not planned for the piles to encroach onto the adjacent cut slopes.

We recently received an approved M&RP modification from OSM for encroaching the north stockpile onto the cut slopes. The Forest is opposed to this modification which we have not consented to.

18. Table 3.2-2, Page 3-27

Discharges reported by UFCo are within the NPDES permit standards, however, the pre-existing water quality has most likely been degraded due to operations. The monitoring program data should include any available data on the pre-existing baseline water quality, for comparison, with an appropriate discussion.

19. Section 3.2.6, Page 3-37

Contaminated materials from the sedimentation pond, if any, must be removed and hauled to the approved disposal area before the pond can be backfilled and reclaimed.

The pond is shown in plan view (Map 3.2.1-4) and in cross section (Map 3.2.1-2).

Map 3.2.1-4 does not contain a plan view of the pond showing the emergency spillway.

20. Section 3.2.6, Page 3-29

Upon abandonment and reclamation, the concrete foundations must not be left in the canyon bottom. The concrete should be used as the initial backfill at the base of the cut slopes to provide support for the backfilled materials and topsoil. Only clean materials will be allowed to be used as fill materials.

The discussion of fracturing and burying the concrete foundations in-place in this section and in Section 4.12.1, page 4-57, should be changed as discussed above.

21. Section 4.7.2, Page 4-33

Revegetation analyses have been conducted annually and reported to the regulating authority.

The Manti-LaSal National Forest has not routinely received these reports. OSM and/or UDOGM must forward copies to the Forest or they must be sent directly to the Forest from the operator.

22. Section 4.7.5, Page 4-35

These data are from those communities disturbed and for reference areas which will be used for comparison (aspen, sagebrush, spruce-fir, riparian).

The reference area must be identified and the monitoring data reported.

23. Section 4.7.7, Page 4-38

Yarrow (*Achillea millefolium*) should be replaced in the seed mix at an equal coverage by Pacific Aster (*Aster chilensis* var. *adscondens*) which is more suited to this environment.

24. Section 4.8.2, Page 4-41

The permittee has prepared and has available at the mine site a Spill Prevention Control Plan as required to be implemented in the event of a spill or leakage of the stored fuels, oils or oil products.

This plan should be included in the M&RP.

25. Section 4.9, Page 4-43

The location of the discussed drill holes and shafts should be addressed by reference to a map or plate.

26. Section 4.11.4

See comments for item 6.

27. Section 4.17.1, Page 4-74

An analysis of the lateral extent of subsidence expected, including the angle of draw, and the amount of vertical subsidence expected in the specific undermined areas must be completed and included in this plan. This must also be graphically displayed on a map which shows the surface features, topography, mined-out areas, projected mining configuration, zone of influence of subsidence (angle of draw projection to the surface), and areas where subsidence will be prevented. Map 4.17.1-1 is not adequate.

Electric Lake and Huntington Creek must be protected from any subsidence. This section states that the upper reaches of Electric Lake Reservoir and perennial streams in the area face potential impact caused by mining. In Section 4.17.2, page 4-74, it is stated that: There will be no mining caused subsidence under either the Electric Lake Reservoir or Upper Huntington Creek inlet to the reservoir.

28. Section 4.17.5, Page 4-79

The initial photography must include color infrared coverage of the entire permit area.

29. Section 5.1, Page 5-1

The fourth item listed under Usage Guidelines is the Manti-LaSal National Forest's Forest Plan for studying the Effects of Underground Coal Mining on Surface and Subsurface Resources, 1978.

As referenced, this plan was a draft version. The plan was revised and finalized on June 6, 1986, and the title was changed to "Manti-LaSal National Forest Monitoring Plan for Studying the Effects of Underground Coal Mining on Surface and Subsurface Resources".



for

REED C. CHRISTENSEN  
Forest Supervisor