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Braxton  
Lipner  
Whitehead  
Heberg  
Cunio

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

**FILE COPY**

Dear Mr. Holbrook:

On December 8, 1986, we received a copy of October 28, 1986 Transmittal of Preliminary Plans for MRP Amendment, Minor Change to Permanent Open Coal Storage Area for the Skyline Mine.

Enclosed with the MRP amendment was a copy of a letter dated October 28, 1986 from UDOGM to your office for review and comment. The letter also states that UDOGM intends to complete the review by November 10, 1986. As indicated by this letter, we must assume that final approval for the amendment has already been given to the operator.

On several previous occasions, we have received similar amendments and upon inspection of the mine area, discovered that the subject amendments are being constructed or have already been completed.

A case in point involved the appearance of the open coal storage areas at the Skyline Mine about two years ago. Prior to appearance of the stockpiles, we had received no notification of the proposal for our comments and/or consent. For aesthetic and environmental reasons we would not have consented to open coal storage in the canyon.

The stockpiles are already in-place and the subject amendment involves expanding the north coal storage area onto the cutbanks. This proposal essentially forms an unstable 35 foot high dam at the mouth of a tributary to Eccles Creek. The canyon above this proposed stockpile experienced a land failure in the years 1983 and 1984 which caused considerable downstream damage. Skyline's underground drainage failed as a result of these slides and the parking area was flooded. Although stream channel cleanup was done to remove flood debris, the failure zones are still active. To construct a 35 foot high dam at this location is of serious concern. We therefore will not consent to the subject MRP amendment.

We feel that a meeting between our respective offices (FS, OSM, DOGM) is in order to discuss these issues. A recent contact with DOGM indicates that such a meeting probably will not be possible until after the holidays.

/s/ William H. Boley

for  
REED C. CHRISTENSEN  
Forest Supervisor

cc: Lowell Braxton, DOGM