

ACT/007/005-

United States
Department of
Agriculture

Forest
Service

Manti-LaSal
National Forest

599 West Price River Dr.
Price, Utah 84501

Reply to: 2820

Date: September 11, 1987

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

Rec DOGM, SLL
9/16/87 LBS

Dear Lowell:

We have reviewed the additional volumes and revised maps and pages (2-27-87) sent to us on May 4, 1987, by your office regarding the five year renewal of Coastal States Energy Company's Mine and Reclamation Plan for the Skyline Mine.

The Manti-LaSal National Forest sent initial comments on the five year-renewal to OSM and your office on December 17, 1986. As of the present time, we have not received any information that indicates that several of our concerns addressed in the letter have been transferred to the company via the permitting agencies, or that they have been addressed by the Division of Oil, Gas and Mining.

A copy of our December 17, 1986, letter is attached for reference. Items 3, 4, 6, 12 and 16 have been adequately addressed in the February 27, 1987, revisions. The remainder of the items need to be resolved. Several of the comments such as Items 1 and 9 are mostly editorial and Item 23 is a suggestion. However, the other concerns need to be resolved before the Forest Service will consent to approval of the five-year renewal.

The following are specific comments on the items discussed in our December 17, 1986, letter:

1. Items 7, 8, 17 and 18

In light of the recent incident in Eccles Creek, the water quality, macro-invertebrate population, and spawning habitat of the creek need particular attention. The foreign materials were discovered and reported by a fisherman before Coastal States Energy Company became aware of the problem. In addition, it took over a week to isolate the problem and take corrective action. Items 7, 8, 17 and 18 in our December 17, 1986, letter need to be addressed. The surface water monitoring plan also needs to be re-evaluated to determine if revisions are needed to provide early detection and corrective action in the event of a similar incident.

To date, we have not received laboratory test results or any reports regarding the actual cause, amount of damage done, nor corrective actions taken regarding the incident. Please make sure that this information is sent to the Forest.

2. Item 17

An acceptable plan for progressive removal of the coal stockpiles has not been considered or proposed. The Forest has consented only to temporary storage of approximately 20,000 tons at the south stockpile. See Items 7 and 17 in our December 17, 1986, letter.

The February 27, 1987, revision has demonstrated a good faith effort by Coastal States Energy Company to mitigate environmental and safety concerns documented in our December 17, 1986, and March 10, 1987, letters which specifically discuss the stockpiles. The provisions discussed on revised (2-27-87) pages 3-22 and 3-24 and increasing the size of the mine site sediment pond may mitigate, to some extent, the identified concerns related to the stockpiles.

Our March 10, 1987, letter documented that the north stockpile would form an unstable dam in the Middle Fork drainage which has demonstrated unstable slopes susceptible to earth and debris flows. The February 27, 1987, revision provides for drainage of the area by leaving one cut slope open, but does not provide for adequate drainage in the event of an earth or debris flow; nor does it provide for access into the drainage by heavy equipment for sediment removal and clearing of the inlet structure.

The five-year renewal must provide for the above items at the north stockpile and planned progressive removal of the stockpiles.

3. Item 27

As stated in Item 27 of our December 17, 1986, letter, the five-year renewal does not include adequate maps showing the existing and planned underground mine workings and does not adequately provide information on the protection of Upper Huntington Creek and Electric Lake.

The February 27, 1987, revision has altered the planned and controlled subsidence areas (Map 4.17.1-1). This revision now proposes to cross under Upper Huntington Creek with a main entry, to full-extraction mine directly under the drainage, and to reduce the buffer zone for protection of Electric Lake and the unleased area by reducing the angle-of-draw factor from 30 to 22 degrees. Electric Lake and Upper Huntington Creek must be protected, both in the short- and long-term (post-mining), from subsidence. The Forest Service will not consent to mining which has potential to cause subsidence underneath the drainage, and an adequate buffer zone must be provided to allow for the angle-of-draw and provide protection from mining adjacent to the drainage.

The Forest Service will not consent to the five-year renewal until the proposed mining plan is revised accordingly and the BLM makes a determination that adequate protection is provided.

Page 4-77 (2-27-87 revision) states that the permittee reserves the right to modify the width of the buffer zone after submitting a minor modification to the mining plan. Any change to the mining plan and buffer zone must be justified with adequate information from monitoring and be approved by the Division, Bureau of Land Management and the Forest Service. This must be clearly stated.

4. Item 13

The references to the Ferron-Price Land Management Plan, 1979, have not been changed to the Manti-LaSal National Forest Final Environmental Impact Statement and Land and Resource Management Plan, 1986, as discussed in Item 13 of our December 17, 1986, letter. The Land and Resource Management Plan discusses specific Forest Service management emphasis for individual management units in and adjacent to the permit area. The permit area includes management areas for which management emphasis is on minerals recovery (MMA Mgt. Area), range and wildlife (RNG), timber (TBR) and the Mountain Fuel pipeline is included in a utilities corridor (UC) management area. These need to be discussed in the pre- and post-mining uses discussions. There is no longer a Coal Lands Management Area A as referenced in the MRP.

5. Items 2, 5, 10, 11, 14, 15, 19, 20, 21, 22, 24, 25, 26, 28 and 29 need a response.

The following are new concerns resulting from changes made and documented in the February 27, 1987, revisions:

6. Section 3.2.6, Page 3-40

This section has been changed to allow the mine site sediment pond to remain after reclamation has been determined to be successful and the area is abandoned. The sediment pond must be backfilled and reclaimed once the other disturbed areas are adequately revegetated and surface runoff is acceptable.

7. Section 3.2.1, Page 3-18

The revision is not consistent with the Preliminary Plans for MRP Amendment, Portal Area Sedimentation Pond Enlargement submitted March 31, 1987. It states in the February 27, 1987, revision that the spillway pipe is sized to allow a flow of 70 cfs. The MRP amendment calls for 80 cfs. The February 27, 1987 revision states that the maximum runoff inflow rate expected from the disturbed 31.1 acre portal site during a 24 hour, 10 year storm is 33 cfs. The MRP amendment calls for 49.41 CFS. A correction is needed.

8. Section 3.2.3, Page 3-22

This section states, "To mitigate potential traffic hazards, the following actions have been taken..."

The traffic pattern which is discussed in Item 2 must be shown on a map and described in detail for review and approval.

9. Section 4.7.2, Pages 4-32, 4-33, 4-34

New lists of seed mixtures for the north and south slopes and the riparian zone have been added for final reclamation. We strongly object to several of the species and the high rates of seed application. The original seed mixes and rates were acceptable.

Table 4.7-4

<u>Agropyron dasystachym</u> Thickspike wheatgrass	-	There is no seed source for this plant.
<u>Bromus marginatus</u> Mountain brome	-	This is actually <u>Bromus carinatus</u> . The seed rate is too high. It should be about 2 lbs./acre.
<u>Archellia millifolium</u> Yarrow	-	This is not a desirable species on National Forest System lands.

Table 4.7-5

<u>Festuca ovina</u> Hard sheep fescue	-	This is not suited for north-facing slopes.
<u>Archellia millifolium</u> Yarrow	-	See above (Table 4.7-4)
<u>Lupinus sericeus</u> Silky lupine	-	This is not suited for north-facing slopes.

Table 4.7-6

<u>Mahonia repens</u> Creeping oregon grape	-	This is not a good species for riparian sites.
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10. Section 4.17.3, Page 4-77

See comment No. 3 in this letter. Upper Huntington Creek and Electric Lake must be protected from any subsidence.

At the bottom of the page there is a statement that if details can be worked out with Mountain Fuel Supply Company, planned subsidence may occur beneath the gas pipeline. The Forest Service will not consent to planned subsidence under the pipeline. The pipeline corridor has been identified as a utility corridor in the Manti-LaSal Land and Resource Management Plan. This corridor needs to be protected.

11. Section 4, 19, 2, Page 4-85

The combined drainage area for the tributaries of Eccles Creek have been reduced from 840 to 801 and the calculated peak runoff was reduced from 130 cfs to 4 cfs. There appears to be a calculation error in this section.

Please respond to our comments and let us know the status of the draft State Decision Package.

The Forest Service will not consent to approval of the Five-Year Mine Plan submitted until our identified concerns are adequately addressed in the MRP and State Decision Package and the Bureau of Land Management makes a determination in consultation with the Division and Forest Service that the mining plan is adequate to protect Huntington Creek and Electric Lake from subsidence.

Sincerely,



for
GEORGE A. MORRIS
Forest Supervisor

Enclosure