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United States
Department of
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Forest
Service

Manti-LaSal
National Forest

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DIVISION OF
OIL, GAS & MINING

Reply to: 2820

Date: March 10, 1987

Lowell P. 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 84180-1230

Dear Lowell:

This letter is documentation and a follow-up to our meeting at Coastal States Energy Company's Skyline Mine conducted on February 5, 1987, concerning the open coal stockpiles.

To clarify our position on the stockpiles, we have the following concerns:

1. Bank to bank coal storage (north stockpile) in the Middle Fork drainage has formed an unstable dam in an unstable canyon. In the event of flooding and continued slope failures, unacceptable resource damage could result.

2. Increased sediment load in Eccles Creek from the open stockpiles may adversely affect the recovering fishery.

   a. Trucks hauling coal to and from the stockpiles are tracking coal fines throughout the area.

   b. Windblown coal fines from the stockpile and road (fugitive coal dust) are being deposited throughout the canyon and adjacent areas.

   c. The contribution of sediment and water from the thawing stockpiles, compounded by normal runoff in the spring, appear to be exceeding the effective capacity of the sediment ponds.

3. The stockpiles and scattered coal fines have resulted in degradation of the visual quality of the mine and surrounding area. The mine and related facilities were designed and constructed to present an esthetically acceptable appearance in the canyon. The coal piles and dust have detracted from this concept.

4. Coal hauling uphill to the stockpiles poses a safety hazard due to the poor downhill sight distance for through traffic and the need for coal trucks to turn uphill and using both lanes of the highway. Visibility for the truck drivers turning to the right and uphill is also impaired.

We also recognize and share in Coastal States Energy Company's concern for economically producing coal and meeting their contracted production levels. We have therefore, further evaluated the situation and will consent to temporary open storage of coal, subject to the following conditions which will hopefully mitigate our concerns:

1. Before the spring runoff period, reduce the north stockpile in size such that it does not extend from bank to bank and so adequate drainage is provided to allow for unrestricted spring runoff flows, and to allow access to the inlet structure with heavy equipment.

2. Reverse the trend in accumulation of fines degrading the fishery in Eccles Creek.

3. Effectively reduce the tracking of coal dust between the portals and the stockpiles.

4. Take appropriate measures to provide for the safety of through traffic on the Eccles Canyon highway in the area used for the coal haulage.

5. Arrest windblown dispersion of coal dust from the stockpiles.

6. Progressively reduce the stockpile volumes at the mine site to an acceptable level within a reasonable time as follows:

   a. Reduce the total open storage to 112,000 tons by the end of 1987.

   b. Reduce the total open storage to 75,000 tons by the end of 1988.

   c. Reduce the total open storage to 50,000 tons by the end of 1989.

   d. Eliminate the south stockpile altogether, clean up the coal dust in the stockpile area and reduce the north stockpile to a total of 25,000 tons by the end of 1990.

We will consider any reasonable alternative proposals for meeting these conditions. The final conditions must be addressed in the Mine and Reclamation Plan.

Our intent is to work cooperatively with Coastal States Energy Company and the Division to evaluate equitable alternatives and to resolve these concerns for coal storage. If you have questions on our concerns or proposed conditions for approval of temporary coal storage, we would be glad to discuss them.

Sincerely,

Reed C Christensen

REED C. CHRISTENSEN
Forest Supervisor