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File Act/007/005 #2

United States
Department of
Agriculture

Forest
Service

Manti-LaSal
National Forest

599 West Price River Drive
Price, Utah 84501

Reply to: 2820

Date: February 10, 1988

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DIVISION OF
OIL, GAS & MINING

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 84280-1203

Dear Lowell:

We have reviewed Amendments to Five-Year Mine Plan Submittal, Coastal States, Skyline Mine, ACT/007/005, Folder No. 2, Carbon County, Utah. This is the September 21, 1987, submittal.

Please reference our December 17, 1986, and September 11, 1987, letters which comment on the Five-Year Mine Plan Renewal. Item #7 identified in the September, 11, 1987, letter has been corrected by the new submittal. In addition, Items 3, 4, 6, 12, 16 and 22 identified in our December 27, 1986, letter have been resolved. The remaining items need a response by DOGM and/or a modification of the Five-Year Mine Plan Submittal.

Our comments on the September 21, 1987, submittal are as follows:

1. Section 4.19.5, Page 4-88

- a. The location and final design of the reclaimed stream channels for the three forks of Eccles Creek have been substantially changed in the Five-Year Mine Plan Submittal. Such changes should be submitted as proposed modifications to the approved Mining and Reclamation Plan, not as hidden changes in the 5-year renewal. The Forest objects to the meandering configuration of the main channel (south fork) and the location of the confluences with the north and west forks. Our concern is that the stream channel will cut through the meander loop over the years and establish a new channel. The original proposed locations of the channels and confluences were acceptable and there is no explanation as to the reasons for the change. Brent Barney from our office spoke with Kent Wheeler of DOGM several times on this matter. Kent seems to be in agreement with this concern.

It appears that Coastal States Energy Company has made an attempt to provide for a more uniform contour in the canyon bottom and minimize the need for the originally approved drop structure in the stream channel. We agree with the concept but object to the meander.

b. We question the 100 year flows calculated for Eccles Creek in the Vaughn Hansen Associates report of May 1980 which is included in Appendix A-1. See Item 11 in our September 11, 1987, letter. From our field and aerial photographic reviews, we have established a runoff curve number of 63-65 for both the 24 hour and six hour storms. The Vaughn Hansen report uses a runoff curve number of 40 for the 24 hour storm and 52 for the six hour storm. The calculated flows are, therefore, substantially lower than our calculations show and substantially lower than those calculated under the original permit.

c. Reclaimed Stream Channel Designs (Appendix A-3)

(1) The design discharge of 7.57 cfs for the west, 7.09 cfs for the southwest, and 2.9 cfs for the north stream do not relate to the data of Vaughn Hansens May 1980 update. The frequency and duration of storms is not identified for these flows.

The reclaimed channels should meet the requirements of UMC 817.44 b(2).

(2) The stream channel depths were determined using an assumed maximum allowable velocity rather than the normal depth associated with the stream section and roughness. This leads to under-sizing the stream channel depth and over-sizing the riprap.

(3) Riprap/streambed gravel sizes were calculated using a specific gravity of 1.55. Generally, these materials would have specific gravities of 2.5 to 2.7. This leads to over-sizing of riprap and streambed gravel.

2. Table 4.2-1, Page 4-8 and Section 4.4.2, Page 4-18

Recontouring of the mine site sediment pond has been deleted from the table. Please refer to Item 6 in our September 11, 1987, letter. The Forest Service objects to leaving the sediment pond to be filled-in naturally. The sediment pond and drainage diversion ditches must be backfilled and reclaimed as originally approved in the MRP. In addition, any contaminated materials in the sediment pond must be removed before the pond is backfilled (Item 19, December 17, 1986, letter).

3. Section 4.7.5, Page 4-39

The change on this page involves the bond liability period. The statement that the portal and loadout areas qualify for the five-year liability period due to the mine site climatological data must be substantiated. We do not receive the climatological data from the company or DOGM, therefore, we have no way to substantiate this statement.

We are concerned about long-term impacts to Forest resources by subsidence as well as for meeting the requirements for revegetation of the disturbed areas. A five-year liability period for the bond regarding revegetation may be adequate but a five-year period would not be adequate to determine and mitigate the effects of subsidence.

Please respond to the Forest and advise us as to whether or not the areas qualify for the five-year liability period as stated. In addition, the company should submit the climatological data to the Forest when it is sent to DOGM.

We received only one copy of the submittal. A copy of the text pages was made and distributed to our District Office. We, however, need an additional set of the maps and drawings.

Sincerely,

A handwritten signature in cursive script, appearing to read "G. A. Morris".

for
GEORGE A. MORRIS
Forest Supervisor