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S. Linney

United States Department of Agriculture | Forest Service | Manti-LaSal National Forest | 599 West Price River Dr. Price, Utah 84501

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DIVISION OF
OIL, GAS & MINING

Reply to: 2820

Date: May 25, 1989

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

RE: Five-Year Permit Renewal Update, Utah Fuel Company, Skyline Mine, ACT/007/005, Folder #2, Carbon County, Utah

Dear Lowell:

We have reviewed the 4/30/89 through 5/15/89 updates submitted directly to our office by Utah Fuel Company for the Skyline Mine Permit Application Package. We have the following comments:

1. Chapter 2, Land-Use

   We have worked with UFCo. directly on rewording the section which describes the Manti-LaSal National Forest Land and Resource Management Plan, 1986. Attached are copies of the pages to be revised with the proposed revisions made in pencil. They were sent to UFCo. on May 22, 1989.

2. Section 3.2.5, Water Pollution Control Facilities, Page 3-29 (5/9/89 Revision)

   It is discussed in the second paragraph that treatment prior to discharge will be provided in the event that pH and heavy metals do not meet NPDES Permit standards. All NPDES Permit standards should be addressed. Even though nitrates and nitrites are not required to be monitored under an NPDES Permit, they are responsible for degradation of Eccles Creek and Scofield Reservoir. Nitrates and nitrites need to be monitored and treatment required if concentrations are found to be excessive. Both the Division and Forest Service have made these comments on past revisions.

3. Section 4.17.1, Subsidence Probability Survey, Page 4-75 (5/9/89 Revision)

This paragraph is misleading. It indicates that subsidence is planned under the upper reaches of Electric Lake Reservoir, Upper Huntington Creek, Bolger Creek, and the South Fork of Eccles Creek. This is not acceptable to the Forest Service. We contacted UFCo. directly and asked them to revise this section. They stated that they do not intend to subside these areas and will make a text revision.

4. Section 4.17.3 Subsidence Effect Prevention Measures, Pg. 4-77 and 4-78 (5/9/89 Revision)

It is stated in the third paragraph on page 4-77 and the first paragraph on 4-78 that a 22 degree angle of draw will be the basis for determining the protective buffer zone. Data presented in the 1988 Annual Report is referenced as justification for this angle of draw. We do not have a copy of this report for reference, therefore, we cannot evaluate this statement. In addition, we need confirmation from the Division and BLM that the 22 degree angle of draw is adequate and justified.

5. Section 4.17.3 Subsidence Effect Prevention Measures, Pg. 4-78 (5/9/89 Revision)

In the fourth paragraph it is stated "Mains and panels within the Electric Lake and Creek buffer areas shown on Map 4.17.1-1 will be a full support room-and-pillar mining system." The Forest Service will not consent to any mining under Electric Lake and perennial drainages until it can be demonstrated with adequate geotechnical data that subsidence will not be induced by this activity. Short-term, life-of-mine time considerations are not adequate considering long-term management of National Forest System lands. Factors such as flooding of the mine workings and pillar saturation must be considered. At the present time there is no geotechnical data presented in the mine plan that demonstrates that subsidence will not be induced by full support entries or panels in the long-term.

The 5-year mining projections (Maps 3.3-1 and 3.3-2, 7/87 Updates) do not show mining in the buffer zones for the permit term presently under consideration. In prior meetings we agreed that it would be acceptable to state that full support mining in the buffer zones could be considered in the future, but only after adequate geotechnical data is presented and specific approval is obtained from the Regulatory Authority, BLM and Forest Service.

Utah Fuel Company was contacted directly on this matter and it was agreed that revisions would be made.

6. Map 4.4.2-1A, Mine Surface Facilities Reclamation Plan

The version of this map submitted to us by UFCo., with the 5/9/89 text revisions, appears to be a draft of a preliminary version. It does not contain a certification or other required information. This map shows the North Fork of Eccles Creek entering the main channel of Eccles Creek at nearly a 90 degree angle. This needs to be revised so that the confluence is more natural and merges at a lesser angle.

The map needs to be updated to show the culverts to be left in place for the highway and a level of detail similar to the previous versions of this map.

If you have any questions, please contact the Forest Supervisor's Office in Price, Utah.

Sincerely,

for
GEORGE A. MORRIS
Forest Supervisor

Enclosures

2.8 AQUATIC WILDLIFE RESOURCES

Introduction

Both Huntington Creek and Eccles Creek flow through the project area and both provide habitat for reproducing resident populations of cutthroat trout. Cutthroat trout from Electric Lake use upper Huntington Creek for spawning and nursery activities. Scofield Reservoir, although stocked with rainbow trout exclusively, has numerous cutthroat trout which have been produced in Eccles Creek and other tributary streams such as Winter Quarters, Woods Creek, Lost Creeks, Pleasant Valley Creek and possibly Boardinghouse Creek.

Eccles Creek

Eccles Creek is a small mountain stream draining west to east into Pleasant Valley Creek which flows north approximately 3 miles where it empties into Scofield Reservoir. Discharges in Eccles Creek are frequently as low as 2 cfs during late summer, fall and winter months; and high flows seldom exceed 50 cfs, even at the creek mouth. Water temperatures of streams such as Eccles Creek fluctuate because of turbulence from the rough channels. During November to March, water temperatures remain between 0-2^{o}C. In the summer, water temperatures often fluctuate from 12-15^{o}C daily although high temperatures seldom exceed 20^{o}C.

Through natural erosion of mudstone, sandstone and shale deposits, Eccles Creek has periods of high total suspended solids (sedimentation). This occurs, however, during periods of high runoff when the stream waters have sufficient energy (velocity) to carry the fine sediments out of the canyon rather than depositing them on the
* coarser substrate materials. During normal runoff years, there are numerous clean trout spawning gravel beds in Eccles Creek. Maintenance of this resource is dependent upon a continuation of flows adequate substrate, food base and water quality conditions.

having one calf, which constitutes an animal unit, consumes 27 pounds per day. The results of this analysis are presented in Table 2.12.2-1 for the yard area, the conveyor corridor and the bypass road.

The capability of the area affected by surface operations and facilities to support forestry uses was determined from the total land area in the spruce-fir and aspen timber types and the available timber volume per area as published by the U.S. Forest
* Service in the "Land and Resource Management Plan" for the Manti-LaSal National Forest, ~~"Management Unit A-1"~~, (~~1979~~ 1986). The spruce-fir timber type contained approximately 10,000 board-feet per acre and the aspen timber type contains 5,300 board-feet per acre. Therefore, within the affected area, there were approximately 201,000 board-feet of the spruce-fir timber and 93,800 board-feet of aspen timber.

the U.S. Forest Service (~~1987~~ 1986), classify local land-use for the lease area of the Skyline Mine as recreation, forestry and mining.

County Zoning Ordinances

The Emery County zoning map dated 1970 and the Carbon County zoning ordinance amended February 15, 1977 with a revised zoning map dated 1974 have zoned the Skyline property for recreation, forestry, and mining (RF&M). Section 8-7-1 of the Carbon County zoning ordinance states:

> "Recreation, forestry, and mining zone has been established as a district in which the primary use of the land is for recreation, forestry, grazing, wildlife, and mining purposes. In general this zone....is characterized by...high grazing lands interspersed by ranches, recreational camps and resource outdoor recreational facilities and mines and facilities related thereto."

U.S. Forest Service Land Management Plan

All but approximately seventy acres of the lease area lie within the boundary of the National Forest, and are therefore subject to
* the "Land and Resource Management Plan" for the Manti-LaSal National Forest prepared by the U.S. Forest Service (~~1987~~ 1986). ~~All lands within the permit area of the lease area located within the National Forest boundary is designated in the land management plan as "Coal Lands Management Area A"~~. In the "Land and Resource Management Plan" the Forest Service lists ~~management~~ specific objectives pertaining to ~~the lease area~~ management of resources and resource uses on all National Forest System lands.
* The Forest Service portion of the ~~permit~~ area is currently identified as a Minerals Management (MMA) Unit. After completion of coal mining activity, the area will revert to a ~~non Minerals~~ Range (RNG) Management unit. ~~The management objectives (U.S. Forest Service, 1979) and the impacts from the Skyline Mine pertaining to these objectives are described in the following sections.~~

National Forest System lands within the permit area include the following management units (management emphasis for each unit is described): [Insert unit descriptions]

Note: Delete pages 2-131 to 137 and replace with a brief statement regarding the compatability of mining with Forest Service management emphasis and objectives (Historical, Current and Post-Mining).

REPLACES	TEXT
Section 2.12.2 Page 2-130	Section 2.12.2 Page 2-130 Date 5/9/89

*Denotes change or addition

Need to retain a discussion on Cultural and Paleontological Resources, however, discuss as a law rather than FS objective. Retain the discussion on Buildings, Public Roads and other man-made Facilities and describe impacts and continued post-mining use of these.

Insert for Pg. 2-130

(Range)
RNG Management Unit – Emphasis is on production of forage and cover for domestic livestock and wildlife.

TBR (Timber) Management Unit – Emphasis is on management for production and use of wood-fiber for a variety of wood products.

UC (Utility Corridor) Management Unit – Emphasis is on providing transportation corridors for major cross-country pipelines, electrical transmission lines and telephone lines. This unit currently contains a gas transmission pipeline constructed and operated under a Forest Service special-use permit issued to Questar Pipeline Company (main line 41).

RPN (Riparian) Management Unit – Emphasis is on management of riparian areas and all the component ecosystems. The units consist of a zone approximately 100 ft. measured horizontally from the edge of all perennial streams and springs, and from the shores of lakes and other still water bodies.

MMA (Minerals Management Area) Management Unit – Emphasis is on making land surface available for existing and potential major mineral developments.