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# State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203
801-538-5340

September 26, 1989

Mr. Vernal Mortensen
Senior Vice President
Coastal States Energy Company
175 East 400 South, Box 3
Salt Lake City, Utah 84111

Dear Mr. Mortensen:

Re: Forest Service Comments, Five-Year Permit Renewal Package, Utah Fuel Company, Skyline Mine, ACT/007/005, Folder #2, Carbon County, Utah

The Division has received comments from the U.S. Forest Service, Manti-LaSal National Forest, on the updated Mining and Reclamation Plan (MRP) for the Skyline Mine (copy enclosed).

The first four comments under the heading "Major Concerns" will need to be addressed by Utah Fuel Company before the Forest Service will concur with permit renewal.

If possible, please address those issues with your October 6, 1989 submittal, or as soon thereafter as is practical, so that permit renewal will not be delayed.

Feel free to contact me if I can provide any assistance.

Sincerely,

Susan C. Linner

Susan C. Linner
Reclamation Biologist/
Permit Supervisor

cl
Enclosure
cc: G. Zumwalt, Skyline Mine
R. Harden, DOGM
BT45/320

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Mine file
S. Linnas

United States
Department of
Agriculture

Forest
Service

Manti-LaSal
National Forest

599 West Price River Dr.
Price, Utah 84501

RECEIVED
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DIVISION OF
OIL, GAS & MINING

Reply to: 2820

Date: September 21, 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, Updated Information, Utah Fuel Company, Skyline Mine, ACT/007/005, Folder #2, Carbon County, Utah

Dear Lowell:

We have reviewed the referenced updated materials and have some comments. Our comments are listed under two major subheadings. The first subheading entitled MAJOR CONCERNS contains comments which we feel need to be resolved before we can consent to approval of the 5-Year Renewal. The second subheading entitled GENERAL COMMENTS contains comments which we feel should be made in any future updates.

MAJOR CONCERNS

1. Section 2.12 Land Use

The references to the Land and Resource Management Plan for the Manti-LaSal National Forest (1979), the Coal Lands Management Unit A-1, and the referenced management objectives are outdated and incorrect. The Manti-LaSal National Forest Land and Resource Management Plan (1986) superseded all of this information. The information presented in this section needs to be changed.

Please reference our letter to UDOGM, dated May 25, 1989. Item 1 states that the information in the MRP needs revision. It also references our enclosure to the letter which shows how the Land Use section needs to be revised to adequately address Forest Service land management objectives for the area. The pre-mining and post-mining land uses for the portal area have not changed from the original MRP and permit, however, Forest Service management emphasis for some of the other areas within the permit area has changed.

2. Section 4.12.2 Proposed Underground Mining Activities and Consistency with Land Use Plans, Page 4-61

The reference to the Forest Plan in pagagraph one of this section is incorrect. The reference needs to be changed to (Manti-LaSal National Forest Land and Resource Management Plan, 1986).

3. Section 4.17.1 Subsidence Probability Survey, Page 4-75

This section states "...the following areas could face potential subsidence impact which may be of concern: Mountain Fuel Supply gas pipeline, upper reaches of Electric Lake Reservoir, Upper Huntington Creek, Bolger Creek, South Fork of Eccles Creek, and U-264 which cross the permit area."

We understand that this statement is intended to set the stage for mitigation measures which are discussed in following discussions. We, however, object to the wording because, as written, it implies that the upper reaches of Electric Lake Reservoir, Upper Huntington Creek, Bolger Creek, and the South Fork of Eccles Creek could experience some subsidence. As is well documented in the lease stipulations and our prior comments on the MRP, we will not consent to mining which could potentially result in subsidence impacts to these areas.

This paragraph needs to be changed so that it is clear that lease stipulations preclude mining induced subsidence in these areas, therefore, the mining plan has been designed to protect them.

4. Section 4.17.3 Subsidence Effect Prevention Measures, Pages 4-77B and 4-78

On page 4-77B, the subsidence buffer zone, based on a 22 degree angle-of-draw, is discussed. Before we will consent to changing this angle from 30 degrees as discussed in the original permit, we will need a statement from BLM that they agree that a 22 degree angle-of-draw will adequately provide protection from subsidence as required in lease stipulations. This statement should be acquired by UDOGM and forwarded to us to provide the necessary coordination between our agencies.

The first paragraph on page 4-78 states "Mains and 'first mining' panels within the Huntington Creek buffer zone shown on Map 4.17.1-1 will be a full support room-and-pillar mining system."

In our prior discussions with Coastal States Energy Co. and UDOGM, we made it clear that we will not consent to mining within the buffer zones for Electric Lake, Upper Huntington Creek, Bolger Creek or the South Fork of Eccles Creek, with the exception of a main entry system for access to the coal which lies to the west. We discussed that we would consent to the

main entry system shown on Map 4.17.1-1 only if adequate geotechnical data is presented to show that subsidence will not occur during the life of the mine or after the entries have been abandoned. In addition, a committment must be made in the MRP which states that approved measures, based on best available technology, will be taken at the time of abandonment of the mains to prevent future subsidence.

We will not consider first mining (other than the main entry system) in the buffer zones unless proven geotechnical data is presented in the mine plan to demonstrate that mining induced subsidence will not occur at any time in the future.

5. Section 4.11.4 Water Quality - Impacts

This section states that clays in the Blackhawk Formation will swell when wet, seal subsidence cracks and prevent dewatering of perched aquifers above the Blackhawk Formation. Even though there is some evidence that this occurs at fault locations, this theory has not been proven. This needs to be addressed in the Technical Analysis.

This section states that 276,000 gallons of water per day is pumped up-dip to the east and discharged to Eccles Creek from the mine workings and that there will be no significant depletion of water in Huntington Creek. The argument is that this water, which would normally flow down-dip to the west, would not naturally surface and be discharged into the Huntington Creek drainage. This statement must also be evaluated in the Technical Analysis. If there is a significant potential for transmountain diversion of water, a mitigation plan must be developed.

GENERAL COMMENTS

1. Maps and Drawings

Several of the maps and drawings do not have professional engineer's seals.

2. Section 2.3 Ground Water Hydrology, Page 2-21

In the second paragraph on this page, the reference to Figures 2.3-A, page 2-133 is incorrect. It needs to be changed to Figure 3.2-A, page 123.

3. Section 2.5.2 Mining Impact on Water Quality

There is no discussion of the impact to water quality and the fishery in Eccles Creek from $NO_2$ and $NO_3$ or the events which lead to the recent problem in Eccles Creek.

4. Section 2.8 Aquatic Wildlife Resources, Project Impacts on Fisheries Resources

See Item 3 above.

5. Section 2.8.1 Aquatic Monitoring Program

The latest data presented in the tables is 1985. More recent data for Eccles Creek needs to be incorporated. There have been numerous studies completed in the last 2 to 3 years.

6. Section 2.12.2 Capability and Productivity of the Permit Area Affected by Surface Operations and Facilities, Page 2-131

In the second paragraph on this page, it is stated that 50.77 acres have been disturbed. This needs to be changed to 52.36 acres to be consistent with page 1-20.

7. 3.2.6 Procedures for Construction through Removal of Major Structures and Facilities

It is discussed that foundations will be broken up and covered with a minumum of two feet of soil. In some locations two feet of cover will not be adequate. Some of the foundations will need to be removed for disposal at locations where adequate cover can be achieved.

8. Section 4.4.4 Stabilization of Rills and Gullies

It is stated in this section that rills or gullies deeper than 9 inches in depth will be regraded. We feel that it is very difficult to deal with a standard such as this because the density, configuration and present condition of the rills need to be considered in determining if repairs or regrading is needed. It needs to be understood that regrading might be required even if the rills do not exceed 9 inches depending on conditions and that the Forest Service will not consent to release of the bond after the liability period if significant rills or gullies are still evident in the reclaimed areas.

9. Drawing 4.4.2-1B1

The lower slope shown on Section "C" needs to be changed from .01 to .05. A corresponding text change needs to be made in Volume 5, Section 18, page 1/18.

10. Section 4.6.4 Topsoil Distribution

It should be understood that all of the topsoil stored in the portal area topsoil stockpile was derived from National Forest System lands. This topsoil must be used exclusively for reclamation of National Forest System lands. Any proposals to use any of this topsoil in other areas must be specifically approved by the Forest Service.

Please send us a copy of the Technical Analysis (TA) for review. As indicated in some of the comments, our consent will hinge on determinations made in the TA. If you have any questions, please call us.

Sincerely,

James L. Home

for
GEORGE A. MORRIS
Forest Supervisor