

United States
Department of
Agriculture

Forest
Service

Manti-La Sal
National Forest

599 West Price River Dr.
Price, Utah 84501

MSH
~~ACT/007/005~~
ACT/007/005 #2

0036

Reply to: 2820

Date: June 13, 1991

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

RECEIVED

JUN 19 1991

DIVISION OF
OIL GAS & MINING

RE: Mining Beneath Stream Buffer Zone Amendment, Utah Fuel Company, Skyline Mine, ACT/007/005-90H, Folder #2, Carbon County, Utah

Dear Lowell:

We reviewed Utah Fuel Company's April 1, 1991 amendment and have several concerns as follows:

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The operator has committed to conduct only full-support mining under the pipeline location. This is consistent with our requirements for protection of the pipeline. The operator must, however, state that mining under the pipeline will be conducted in accordance with their agreement with Questar Pipeline Company. In addition, we must receive documentation from the operator and/or Questar Pipeline Company that shows that Questar Pipeline Company and the operator agree that the full-support mining planned under the pipeline will provide for adequate protection.

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At the top of the page it is stated that the width of the supportive mining area will be adjusted, as appropriate, when future information and monitoring shows it to be necessary. We object to this wording since it sounds like the operator will make the adjustments without review and approval of the regulatory authority and surface management agency. This sentence should be deleted or another sentence should be added which states that no changes will be made without the approval of the regulatory authority.

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Paragraph 3 states that there will be no mining-caused subsidence under either the Electric Lake Reservoir, Upper Huntington Creek and Bolger Creek inlets to the reservoir, and no mining from which subsidence at a 22-degree (from vertical) angle-of-draw would influence either these reservoir inlets or the high-water level of Electric Lake Reservoir.

This statement must be revised. The reader is led to believe that full-support mining under the stream buffer zones will be completed. The only location for which any mining, including full support mining, has been approved under the stream buffer zones is the northernmost east/west main

shown on Map 4.17.1-1 and the 7 Right Bleeder entry. It must be clear that no mining will take place beneath the Electric Lake and stream buffer zones unless specifically approved by the regulatory authority, Forest Service and BLM and that at the present time this approval has been obtained for the area discussed above only. Proposals to mine beneath perennial drainages must be specifically proposed and approved location by location before any mining can take place.

This paragraph identifies the Bolger Creek inlet and Upper Huntington Creek inlets to the reservoir for protection from subsidence. It must be clear that the entire stream reaches are protected. In addition, Burnout Creek is known to be perennial from its confluence with Upper Huntington Creek to the forks as discussed in our meetings with the operator. Utah Fuel Company is in the process of studying the forks of Burnout Creek to determine how far up the canyon they are perennial. It needs to be discussed that this is being done and that any perennial drainages will be protected.

In the last paragraph on this page the operator states that mining is planned for the area west of Upper Huntington Creek and Electric Lake Reservoir. Before any mining in this area can be evaluated for approval, it must be determined whether or not any of the drainages in this area are perennial. Bolger Creek is known to be perennial and has been addressed, however, the other drainages such as Swens Creek and Little Swens Creek must be evaluated. If they are determined to be perennial, buffer zones must be delineated and identified for protection.

Map 4.17.1-1

This map needs to be revised to reflect the changes discussed above.

General

Hydrologic Monitoring shows that Eccles Creek and it's tributaries are perennial. Protection of these drainages needs to be discussed.

Sincerely,



for
GEORGE A. MORRIS
Forest Supervisor

cc:
C.Reed
D-3