

Reply to: 2820

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Date: May 13, 1992

Lowell Braxton
State of Utah Natural Resources
Division of Oil, Gas and Mining
355 West North Temple
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Salt Lake City, Utah 84180-1203

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DIVISION OF
OIL GAS & MINING

RE: Five-Year Renewal, Utah Fuel Company, Skyline Mine

Dear Lowell:

We have reviewed the new volumes of the Mining and Reclamation Plan submitted for the five-year renewal. Our comments are as follows:

1. The mine plan proposes full-extraction longwall mining under Burnout Creek and does not address mitigations (on-site and off-site) or monitoring in sufficient detail to evaluate this proposal. Lease stipulations currently prevent mining and subsidence of perennial drainages unless specifically proposed, evaluated and approved.

Burnout Creek is a fishery and provides water needed for downstream uses, including resource production. Before such a proposal can be evaluated, the operator must submit detailed information on how potential impacts could be mitigated and how resource conditions would be monitored to detect any impacts and trigger mitigation.

The mine plan must be revised to show adequate protection of Burnout Creek from subsidence until such time as a proposal is evaluated and required approvals are obtained.

2. The subsidence control plan shows that the Questar gas pipeline would be protected by employing full-support mining techniques within the pipeline buffer zone. The Forest Service will not consent to any mining beneath the pipeline until we receive documentation showing that the operator has informed Questar Pipeline Co. of the intent to mine under the pipeline and no objections have been received.
3. The subsidence control plan contains a discussion of where and how specific areas would be protected from subsidence. Buffer zones are established for this purpose. The only place full-support mining has been approved beneath the stream buffer zones is in the northernmost east-west main and the 7 Right Bleeder entries. There are some misleading statements that need to be revised as follows:

Map 4.17.1-1 shows that a second east-west main extends into the Upper Huntington Creek Buffer Zone. The map needs to be revised to show this main ending at the buffer zone line.

Page 4-95 (second paragraph) states that full extraction mining techniques under the creek buffer zone will only be proposed if evidence shows that surface effects, if any, can be mitigated. This sentence should be revised to state that no mining (other than the two areas already discussed) has been approved under the creek buffer zones and that prior approval must be obtained for any such mining.

Page 4-94 (third paragraph) states that Map 4.17.1-1 shows the Electric Lake and inlet buffer zone within which there will be no full extraction mining. This sentence must be revised to state that there will be no mining in these areas.

4. James Canyon and the inlet areas of Swens Canyon and Little Swens Canyon to Electric Lake lie within the permit area. The operator must collect data to determine if these drainages are perennial or intermittent. If they are determined to be perennial, appropriate measures will be required to protect them. Map 3.3-1 shows a projection of mining in the James Canyon area, but it is difficult to tell if this mining extends beneath James Canyon.
5. The mine plan does not include a vegetation monitoring plan for the permit area as required in lease stipulations. A vegetation monitoring program is required which would detect any gradual changes in the extent and distribution of vegetation communities from mining and subsidence. The operator discusses color infrared photography but does not discuss a vegetation monitoring plan. The operator must provide a comparison of the extent of vegetation communities prior to mining and at five-year intervals. The five-year intervals and submittals should correspond with mid-term reviews. The mine plan must be revised to commit to this monitoring.
6. Vegetation communities are discussed in Section 2.7 and Map 2.7.1-1 shows vegetation communities over the permit area as they were prior to mining. Volume A-2 (blue cover) from the last 5-year renewal which contains detailed information on vegetation communities is referenced on page 2-59 (paragraph 2). Volume A-2 was not brought forward as part of the mine plan for the current 5-year renewal (red cover). The Appendix volumes are also referenced in other sections. Appendix Volumes A-1 through A-4 (blue) need to be formally included in the MRP by adding them to the Table of Contents and making sure that they are made part of the current plan.
7. Map 2.3.5.2-1 (Ground Water Rights) is outdated. The Forest Service has filed claims on several springs in the Burnout Canyon area. This map needs to be updated to show these springs.

The water monitoring plan needs to be revised to show monitoring of the additional springs with water rights claims. A copy of the water rights claims are attached.

8. Map 2.3.5.1-1 (Surface Water Rights) shows water rights claim (93-8). Stream monitoring in accordance with DOGM guidelines must be conducted just above the confluence of this tributary with the main fork of Upper Huntington Creek.
9. As discussed in item 4 above, James Canyon Creek needs to be characterized and monitored. A stream monitoring point must be established in the channel above the inlet at Electric Lake or at the Forest boundary.

The above items need to be resolved before the Forest Service will consent to the discussed provisions of the Mining and Reclamation Plan. If you have any questions, please contact us at the Forest Supervisor's Office in Price, Utah.

Sincerely,



for
GEORGE A. MORRIS
Forest Supervisor

Enclosures