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To: Pam Grubaugh-Littig
From: Dale Harber
Subject: Permit Extension - Skyline Mine
Total Pages (including cover page): 5

Comments:

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DIVISION OF
OIL, GAS AND MINING

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United States
Department of
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Manti-La Sal
National Forest

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File Code: 2820-4

Date: October 23, 2002

Pamela Grubaugh-Littig
Permit Supervisor
Utah Division of Oil, Gas and Mining
1594 West North Temple, Suite 1210
P.O. Box 145801
Salt Lake City, UT 84116-5801

Re: Permit Extension to Skyline Mine (North Lease), Comments Requested by October 4, 2002, Canyon Fuel Company, LLC, Skyline Mine, C/007/005-SR021, Outgoing File

Dear Pam:

We have completed our review of the initial submittal by Skyline Mine and the supplemental information that you forwarded on October 11, 2002. There are several areas that need additional information or clarification before we can consent to extraction (longwall or second) mining within the Winter Quarters Tract (North Lease). Specifics of the supplemental information are detailed below. We are able to consent to development (first) mining within the Winter Quarters Tract that would not result in subsidence of the ground surface.

The following information will be needed for further analysis of the proposed mining:

1. A life-of-mine plan for the entire lease which projects mining beyond the 5-year plan enclosed in the submittal. The information should show all areas of potential mining, numbers of seams to be mined, etc. Expand the descriptions of the impacts to cover the entire Winter Quarters tract, including the Woods Canyon area. The 5-year plan enclosed with this submittal does not match the plan provided by Skyline in August, 2002 with their permit modification application to increase the permit area. Drawing 3.1.8-2 shows two panels east of the mains, south of Winter Quarters Canyon. The western of the two panels would be on National Forest System lands. This information is necessary to evaluate the extent and nature of potential mining impacts.
2. A map showing the extent and magnitude of potential subsidence. There must also be a discussion of how subsidence may be affected by the faulting in the area, such as the potential for focused subsidence along the faults.
3. The macroinvertebrate surveys should be done this fall and next spring.
4. Stream gradient surveys of all streams which may be subsided.
5. A map showing all perennial stream reaches.
6. The hydrologic monitoring plan must be expanded to provide more detail regarding objectives and methods.



7. There is a general lack of substantiation of statements made within the plan.. Cite references that support statements.

The following comments are keyed to specific portions of the text.

Page 2-4c, partial paragraph at top of page.

Nesting goshawks were located within the Winter Quarters Lease during the 2002 field season.

Page 2-13, 2.2.7 Mineable Coal Deposits

The second sentence does not make sense and must be revised. As is it reads "The Lower O'Connor "A" and Flat Canyon seams merge in the western portion of the North Canyon and the Lower O'Connor "A".

Page 2-24a, 2.3.2 Characteristics of Seeps and Springs, last sentence of first paragraph.

Substantiate this statement. It is true only if all the springs in the area are adequate for wildlife and sheep use. The presence of another spring nearby does not ensure that it has adequate flow to meet needs.

Page 2-35a, last paragraph.

Spring WQ4-7 and surface water points C-18 and C-19 are listed as water monitoring points in the text, but are not shown on Drawing 2.3.6-1. Show their location on the map.

In general, the water quality monitoring program must be described in more detail. Provide the rationale for the choice of monitoring springs. Provide monitoring of springs on faults that will provide data on potential impacts as mining passes through the faults. There is no proposed stream monitoring in Woods Canyon. Winter Quarters Creek should be monitored continuously.

Page 2-42, 2.4.4 Monitoring Program, second paragraph.

Explain the changes to the surface and ground water monitoring program recommended by Mayo and Associates.

Page 2-49, 2.5.2 Mining Impact on Water Quantity, first paragraph.

While monitoring of Burnout Canyon continues, the Burnout Canyon study is complete. As this study was done over the southern portion of this same mine, it should be referenced in this section. The predicted impacts should rely heavily on the Burnout Canyon study. Provide documentation on the rapid sealing of subsidence cracks by swelling clays, especially the accelerated sealing in streams. Briefly describe the clay mineralogy. Describe how the cracks seal when they are formed by tensional forces.

Page 2-50, last sentence of first partial paragraph.

Explain how the water pumped into Eccles Creek has a positive effect on aquatic flow systems. Provide documentation of the positive effects. Are there any negative effects? If so, explain them also.

Page 2-51, 2.5.3 Alternative Water Supply, third and fourth paragraphs.

Describe what documentation is required to show that a water loss has occurred, and explain the duration of the replacement.

Page 2-63f, 2.7.6 Vegetation of the North Lease Tract Area

There is no description of a vegetation-monitoring plan. This plan is required and must be evaluated by the Forest botanist.

Page 2-99a, Surface Disturbance, first paragraph.

The second and last sentences do not make sense. Rewrite and clarify their meaning.

Page 2-99a, Surface Disturbance, second sentence of second paragraph.

The meaning of this sentence is unclear: "No significant impact will occur to wildlife as the ground will be uneven, but wildlife will have unlimited use of the area." Please clarify.

Page 2-99a, Subsidence.

Rewrite this paragraph to discuss the potential subsidence over the tract. Skyline Mine has collected detailed subsidence data for many years and should be able to provide a reasonably accurate prediction for the Winter Quarters tract. References to subsidence in New Mexico are totally irrelevant when local data are available. Use the Burnout Canyon study for conclusions and reference it. Explain the methodology for subsidence monitoring.

Page 2-99b, Loss of Habitat.

In the first sentence, describe how much habitat will be lost, and describe the impacts. Until the impacts are quantified, it is impossible to truthfully say that the acreage is small in comparison to that available.

Page 2-103.

The number of amphibian and reptilian species reported to inhabit the area is different in the first paragraph of "Wildlife Studies" and in the paragraph on "Herpetofauna". The number of mammal species reported to inhabit the area is different in the first paragraph of "Wildlife Studies" and in the paragraph on "Mammals" on page 2-104. Ensure the correct numbers are used consistently.

Page 2-104, Furbearers.

The Forest Service knows of no record of pine martens inhabiting this area. Unless it can be documented, remove them from the list. Add bobcat to the list of furbearers in the area.

Page 2-104, Game Species.

Describe the classification by DWR as "special game species" for mountain lion and black bear.

The first sentence of the paragraph states that nine game species potentially occur in the area. Only five are mentioned. What are the other four species?

Drawing 2.2.1-1, Surface Geology

Label the faults consistent with the text.

Drawing 2.3.6-1, Location of Hydrologic Monitoring Stations

Spring WQ4-7 and surface water points C-18 and C-19, which are listed as water monitoring points in the text, are not shown on this map. Also include the surface geology, faults, and any other features which are relevant, based on the objectives of the water monitoring plan.

Drawing 3.3-2, Lower O'Conner "A"/Flat Canyon Five Year Projected Mine Plan

This map does not correlate with Drawing 3.1.8-2 provided by Skyline Mine in August, 2002, with their permit modification application to increase the permit area. The earlier application included 2 panels east of the mains, oriented north south. If these 2 panels are actually planned, they must be evaluated to determine potential impacts to National Forest System lands. Please provide a corrected copy of Drawing 3.3-2 if these 2 panels are planned.

Please contact Dale Harber at (435) 636-3548 if you have any questions.

Sincerely,


ELAINE J. ZIEROTH
Forest Supervisor