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United States
Department of
Agriculture

Forest
Service

Manti-LaSal
National Forest

599 West Price River Drive
Price, Utah 84501

Mine File ACR/007/006
J. Whitehead

Reply to: 2820

Date: August 17, 1987

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

AUG 24 1987

DIVISION OF OIL
GAS & MINING

Dear Lowell:

The Manti-LaSal National Forest has reviewed Plateau Mining Company's ACR responses for five year repermitting of the Star Point Mines and the State Decision Package for the five year renewal and New Lands Application.

Items 9, 14 and 15 in our March 10, 1987, letter to OSM have not been addressed in any of the responses. A copy of this letter is attached. The Mine and Reclamation Plan must be revised to address these items.

The Manti-LaSal National Forest boundary is incorrectly plotted on the majority of the maps included in the plan. This has been discussed with PMC. As new and revised maps are submitted, the corrections should be made.

During our review of the Decision Package, the concern was identified that the mining plan for Federal Coal Lease U-13097 may not provide adequate protection of the Wild Cattle Hollow drainage from the affects of subsidence. As discussed on page 11 of the CHIA, the longwall panels of the Plateau Mine sequence will abut the channel as the mine progresses in a southwesterly direction. Wild Cattle Hollow is a designated perennial creek on the U.S.G.S. quadrangle map.

The mine plan must provide for protection of the drainage from subsidence and the Mine and Reclamation Plan must adequately demonstrate that subsidence under the drainage will not occur.

Forest Service consent for approval of the five year renewal will be contingent upon resolution of the discussed items. }*

Sincerely,

W. G. Kelley

for
GEORGE A. MORRIS
Forest Supervisor

* John Let's discuss. Thax Samuel

5/27

Enclosure

United States
Department of
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Manti-LaSal
National Forest

599 West Price River Drive
Price, Utah 84501

Reply to: 2820

Date: March 10, 1987

Mr. Richard M. Holbrook
OSM - Reclamation and Enforcement
Brooks Towers
1020 15th Street
Denver, Colorado 80202

Dear Rick:

Following are our comments on Plateau Mining Company's Five Year Permit Renewal Package:

1. Volume 1, Tables, Figures, Maps and Exhibits

The volume, section and page numbers where these materials are found should be included to make it easier to find them.

2. Volume 2, Exhibit 4 - Historic and Cultural Resources, Page 5-5

During 1981, a reconnaissance survey will be completed covering the remaining portions of the permit area.

Has this survey been completed? If it has been completed, the results need to be added to the plan.

3. UMC 783.22 Land-Use Information (C), Page 783-135

The portion of the permit area within the Manti-LaSal National Forest is subject to the "Land Management Plan" of the USFS (1979).

The Ferron-Price Land Management Plan, 1979, has been superseded by the Manti-LaSal National Forest Final Environmental Impact Statement and the Land and Resource Management Plan, 1986.

4. Section UMC 784.11, Page 784-3

It may be necessary to develop a vertical shaft in the vicinity of SE-1/4 to Section 14 in Lease U-13097 to allow extraction of the coal reserves within this lease.

We need to make it clear at this point in time that approval of this facility or any similar surface facilities on National Forest System lands will involve a formal application in the form of a proposed Mine Plan Amendment. The amendment must be proposed at least one year in advance of the intended date for construction, including plans and designs for the facilities and access. The approval procedure would involve an Environmental Analysis and management requirements by the Forest Service, which will be the basis for the consent decision.

5. Volume 2, Table 70

The proposed seed mix for reclamation of the Corner Canyon and Mud Water Canyon breakouts must be revised as follows:

Alpine timothy (*Phleum alpinum*) should be changed to Timothy (*Phleum pratense*).

6. Section UMC 784.14, Page 784-81, Paragraph 2

. . . monitoring stations on the west side of the Bear Canyon graben will be monitored for a two year baseline period and then will be dropped from the schedule until 1991 when operational monitoring of these sites will begin.

Three years of monitoring is needed to obtain adequate baseline data. Monitoring should also begin well in advance of mining in the area.

Map 31 shows that only spring 452 on Lease U-13097 will be monitored. Four springs within the lease have been developed by the Forest Service with troughs. They are circled on the enclosed map which was copied from Map 30. One of the springs was not identified by Plateau Mining Company. These springs must be monitored such that impacts from mining will be detected.

7. Section UMC 784.14, Page 784-82

Arsenic, boron, barium, cadmium, and chromium are detected occasionally in several streams in this area. They should be monitored on at least a five year basis to determine if it is being concentrated by the mining operation.

Mercury has been found in the sediments and fish in Scofield Reservoir. Mercury should be monitored to show positive data that it is or is not being concentrated by the mining operations.

Nitrogen and phosphorus should be continued. They are elements leading to eutrophication of lakes. Scofield Reservoir is eutrophic and phosphates are believed to be the cause. Nitrate in excess can cause health problems, and water obtained from Tie Fork and Mud Creek is used by municipalities.

We have no objection to dropping Kjeldahl nitrogen, copper, nickel, and selenium.

8. Section UMC 784.14, Page 784-86

Baseline water quality samples will be analyzed for the parameters listed in Table 80, Baseline Low Flow Water Quality Analytical Schedule.

The reference to Table 80 above must be changed to Table 82.

9. Section UMC 784.14, Page 784-87

Since State numerical standards for these elements are in the dissolved form, the analyses should contain the dissolved parameters.

10. Section UMC 784.14, Page 784-89

Flow hydrographs for springs SF-1, S11-1, S17-2, 748, 741, and 753 (which are springs monitored over the past five years as part of the monitoring plan) are presented on Figure 13, Flow Hydrographs - Springs.

This information is not included as stated.

11. Section UMC 784.21, Page 784-146

No wetlands or riparian areas exist in the vicinity of surface operations.

Riparian areas include all areas within 100 feet horizontal distance of the mean high water line of any perennial water [36 CFR 219.27(e)].

What about Corner Canyon and Mud Water Canyon? They are considered perennial downstream from the mine. They could contain riparian vegetation in the permit area.

12. Table 11

Flood frequencies must apply to a particular point on the stream. For the data to be meaningful, the locations where the flood frequencies were measured must be indicated.

13. Exhibit 7

The cumulative water quality monitoring reports show negative values for some parameters. The water quality summaries and analysis of these data with regard to water pollution hazards need to be reviewed to see if the negative values have been erroneously entered into the calculations.

14. Exhibit 19, Soils Information

The exhibit should cite the sources of information and contain a reference to the soils map (Maps 38-41).

Several soil units have been delineated on Map 38 without soil map unit descriptions. All of the mapped units should be accompanied by a description.

15. Table 68

The Corner Canyon Breakouts also include a tank and deck. These must be included in the Area and Facilities column. The Reclamation Activities column discussion must be revised to state that the breakouts will be sealed from within the mine. In addition, it must be added that the disturbed area will be backfilled with subsoil stored in the mine and retopsoiled with the specifically stockpiled topsoil. The area must be contour trenched or waterbarred and seeded. The only access is from within the mine.

Add the Seeley Canyon Breakouts to the table. Indicate that they will be sealed and backfilled.

The Manti-LaSal National Forest has not routinely received hydrology information. This information must be sent to the Forest when it is submitted to the Utah Division of Oil, Gas and Mining. Annual reports for past information will be adequate for our needs. New information, including the quarterly water monitoring reports, should be sent to the Forest.

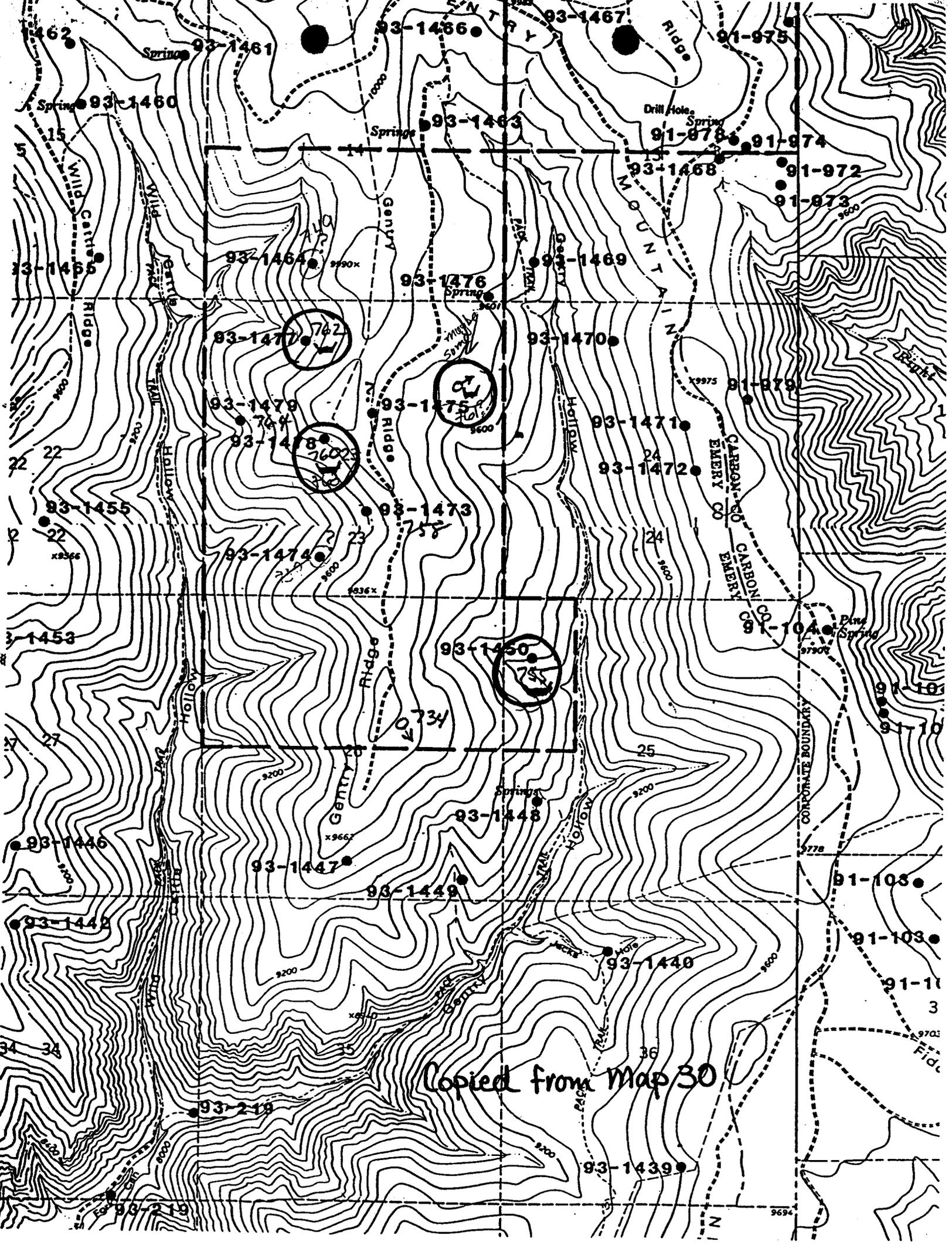
Sincerely,

/s/ William H. Boley

for
REED C. CHRISTENSEN
Forest Supervisor

Enclosure

cc: Lowell Braxton - UDOGM, D-3, C.Reed



Copied from Map 30