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ACT/007/006 #2

**DIVISION OF
OIL GAS & MINING**

April 11, 1991

Mr. Aaron Howe
Forest Engineer
U.S.D.A. Manti La-Sal National Forest
599 West Price River Drive
Price, Utah 84501

Dear Mr. Howe,

RE: CASTLE VALLEY RIDGE PERMITTING - ISSUES MEETING 4-8-91

We appreciate the opportunity to have met with you on April 8 to discuss some of the issues facing us in permitting the Castle Valley Ridge Federal Coal Lease UTU-64263.

This letter is written to present our understanding of the outcome of the meeting. Please contact me if you have a different understanding of the items discussed.

The various discussion topics will be presented, along with the main action items for each topic.

- 1- Hydrology - Hydrology of the CVR lease should be addressed in the Probable Hydrologic Consequences Determination on a regional basis and site specific basis:
 - A. Where is the ground water, where is it moving, what will be the mining impacts, where is the recharge zone, and what is the recharge rate?
 - B. What will be the mining impacts be on the Little Park Canyon stream? How will the mine layout protect the stream? The stream is perennial and must be protected from mine subsidence impacts. Mining beneath the stream where there is less than 400 feet of overburden should be done only where no stream impacts can be guaranteed. Barriers beneath the stream should be designed to stand for an indefinite time period. BLM will be consulted by the Forest Service to document that pillar designs are adequate.
 - C. What impacts will be seen at the Tie Fork culinary springs from mining in the CVR area and the U-13097 lease?
 - D. Monitor springs with U.S. Forest water rights. Plateau has been monitoring baseline data on all but one of these springs for two years. Spring 91-4093 should be added.

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There are some data from a previous study by Seiler and Baskin (1988) for this spring.

- E. What will mining impacts be on the Nuck Woodward Canyon stream?
- F. Should the Little Park Canyon stream riparian habitat zone be monitored for mining impacts?
 - 1. What is the Forest Service policy on this issue? There is no clear consensus on this. Forest Service personnel will discuss it and tell us what should be done.

If the philosophy is to protect the stream at all costs, then what is the need to monitor the riparian habitat. Mining layout to protect the stream will prevent impacts from affecting the riparian vegetation community.

- 2- Breakouts - Breakouts for emergency escapeway are needed at the west end of the main entries in the vicinity of the Little Park stream. Only one access point to the two leases on the west side of the graben is available, the graben crossing tunnels. A mine disaster might leave mining personnel without an escape path.

The exact location of the proposed breakouts cannot be determined at the present time. Further geologic investigations must be made to accurately locate the breakouts. A general area may be chosen (say 20 acres) for potential breakout. Environmental analysis of the area can be performed with the intent of having a window to aim for. General details of the breakouts can be provided now, with final details to be submitted before final breakout.

You indicated that this scenario may be acceptable, and that an ID team would have to do it's work before approval of the area.

- 3- Subsidence Monitoring - Subsidence monitoring of the U-13097 and CVR leases is proposed to be done differently than past Plateau monitoring. Based on monitoring of lease SL-031286, we can model subsidence on lease U-13097, and CVR. Less dense monitoring points can be used on U-13097 and CVR to verify the model.

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You indicated that you did not know what the current Forest Service requirements are for spacing of monitoring points. You also indicated that your personnel should revisit the subsidence monitoring program.

We agreed to propose a monitoring program for the two leases.

Again, thank you for your time, and let me know if there is anything I missed, or interpreted incorrectly.

Respectfully,



Ben Grimes
Sr. Environmental Engineer

c: Pamela Grubaugh-Littig
David Hansen

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