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United States Department of the Interior
OFFICE OF SURFACE MINING
Reclamation and Enforcement
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Mr. Leland Spencer
Utah Division of Oil, Gas and Mining
1588 West North Temple
Salt Lake City, Utah 84116

Dear Mr. Spencer:

I am attaching comments prepared by members of my staff in response to certain items in the Sage Point-Dugout Canyon Mine Determination of Apparent Completeness Review sent to this office on October 9, 1981.

I regret that present staffing levels did not permit our reviewing all the elements of your completeness document, but we did evaluate those asterisked items which you particularly brought to our attention. It is hoped that these comments will be useful to you as you obtain the remaining information needed for your initiation of the technical analysis on the Sage Point-Dugout Canyon Mine.

Sincerely,

Robert H. Schueneman for
Richard E. Dawes
Deputy Administrator
Western Technical Service Center

Enclosures

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DIVISION OF
OIL, GAS & MINING

UMC 783.15 Ground Water Information

The company's rationale justifying their ground water quality effort may be accurate; however, sufficient data is not included to enable OSM to fully concur. Not much information has been made available for anyone to conclude whether spring water quality is a function of water derived from storage in the formation matrix or from fracture storage. Water quality information from monitoring wells would help substantiate this. This information (matrix water quality versus fracture water quality) would be useful in order to predict the trend in water quality of post-mining water discharges. Such predictions may otherwise be difficult due to subsidence induced fractures which will expose fresh geologic surfaces to water. The applicant in pages II-89A-II-92A suggests the formation will behave in a plastic manner and therefore impacts will not be noticed. Experience in the Mesa Verde Group mines suggests subsidence induced fracturing does alter the hydrologic system. The purpose of ground water baseline information is in part to have background information to assess changes in water quality during and after mining. The solution may be for the company to monitor wells for a period of time before mining has a chance to disrupt the ground water system. OSM could assist in design of such a monitoring scheme.

UMC 783.16(b)(2) Surface Water Information

OSM concurs that the additional information available be provided and assessed to determine if adequate to illustrate seasonal variation. Changes in the current monitoring scheme (either to decrease or increase monitoring) should be made after such a determination.

UMC 784.14(a)(4) Protection of Hydrologic Balance

Based upon the information in the application and the drawing cited in ACR response, it appears that the portals are located well below what is represented as the regional potentiometric surface. This suggests that the portals may discharge at least seasonally. If the applicant's basis for the no discharge claim is based on additional information, the information should be provided.

UMC 785.19 AVF

It is not clear from the information available to me if an actual AVF determination has been made where the essential hydrologic functions have been assessed. In reviewing the file it is evident that the AVF issue has been somewhat confused by various interpretations of Congressional intent. It does not appear at this point that the AVF issue represents a problem, however in the interest of clarifying the OSM position a separate response will be forthcoming soon.

UMC 783.12(b)-Cultural Resources

1. Further work is required on four sites 42Cb168, 42Cb199, 42Cb92 and 42Cb168 to determine eligibility. The work should be minimal in nature and designed to cause as little damage to the site as possible.
2. A more detailed site specific mitigation plan is required for all those sites that are determined eligible and are to be impacted by mining or mine related activities. What has been submitted as a mitigation plan is not detailed enough. Both prehistoric and historic sites must be considered.
3. The "Historic Sites" documentation and eligibility recommendations and mitigation plan must meet the Utah SHPO's approval. (When the SHPO calls back and says that the historic documentation is complete, we anticipate that we can remove item 3.)

UMC 817.21 Topsoil: General Requirements

Additional soils information is needed to support the salvage depths and volumes in accordance with 817.22(c) and (d). Specifically, additional data are needed for the IL Defonso stony loam (IEC) occurring on the preparation plant waste disposal site. Data is provided to a depth of 150 cm, however, the maximum salvage depth is 15' (457 cm). In addition, data is needed for the Haverson loam unit (HAC) on the Anderson Reservoir site to a depth of 6' (183 cm). Since these units contain the majority of the salvageable soil material for the mine site, it is felt that a few additional samples are needed throughout the salvage depths in each unit in order to allow the assessment of the suitability of these materials (IV-C.4.1.1, IV-C.2[2]).