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UNITED STATES DEPARTMENT OF AGRICULTURE  
FOREST SERVICE

UT0006

0011

Manti-LaSal National Forest  
350 East Main Street  
Price, Utah 84501

2820

March 27, 1980



Mr. Donald Crane  
USDI, Office of Surface Mining  
Reclamation and Enforcement  
Brooks Tower Second Floor  
1020 15th Street  
Denver, Colorado 80202

Dear Mr. Crane:

The Forest Service received the hydrologic monitoring plan submitted by United States Fuel Company on February 12, 1980. After reviewing this document, we have the following comments and recommendations.

Within the Gentry Mountain area, there are many springs and seeps in addition to those that appear on U.S. Fuel's maps. The groundwater level is high, with indications of an artesian system. The volume of groundwater in the Gentry Mountain area appears to be greater than in adjacent areas.

The Bear Canyon Fault (running N-S through Gentry Mountain) is apparently a major carrier, or perhaps a collector, of water. Whether the water along this fault is tributary to the fault or distributary from the fault remains unknown (that is, either the high water table exists along the fault because the fault is full of water, or the fault is full of water because of a high water table). Because of steep dissected topography, it seems most likely that a distributary condition exists. If such is the case, mining into the fault will adversely impact the groundwater system in the area, including adjacent areas where no mining occurs.

Water in the area supports both livestock and wildlife uses and is additionally important as a source of municipal water. Several springs, located both on and off the lease area and which are critical to present range management, appear to originate in the fault zone. Other springs important to Forest management, although not located along the fault line, may owe existence to the high water table fed by the fault.

Both Plateau and U.S. Fuels have mined into this fault at several locations, resulting in considerable water flows at each location. Flows from these mines are reported to come mainly from the fault zone. Ranchers and permittees in the area report that flows from some springs and seeps have diminished and others have dried up completely.

It would seem that the basic concepts and needs for monitoring are not being understood. Basic hydrologic data, along with data on geology, topography, vegetation, and water use are not being assembled into a form by which the monitoring program can be formulated.

We recommend that a hydrologic inventory be made of the U.S. Fuel mine area and adjacent areas which could be affected. Basic geologic data (such as joints, faults, potential aquifers, etc.) should be part of this inventory.

U.S. Fuel's map indicates that many exploratory drill holes have been completed over the area. Also, a gas well in the NE $\frac{1}{4}$  of Section 11, T15S, R7E, was used as a water well. It is still cased and perhaps usable. Data from these drill holes may be available to assist in developing a hydrologic base data inventory.

At this time, we have insufficient data to evaluate the U.S. Fuel Hydrologic Monitoring Plan. It is not acceptable as presented in this document.

A copy of our letter to OSM, dated December 31, 1979, concerning the Valley Camp Hydrologic Monitoring Plan is attached. The concerns expressed by this letter are the same concerns we have for the U.S. Fuel's Monitoring Plan. To aid U.S. Fuel in developing an approach in response to these concerns, perhaps Valley Camp's recently formulated hydrologic plan could be used as a model. We offer this suggestion only for clarification.

Sincerely,



for  
REED C. CHRISTENSEN  
Forest Supervisor

Enclosure