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United States Department of the Interior
OFFICE OF SURFACE MINING
Reclamation and Enforcement
BROOKS TOWERS
1020 15TH STREET
DENVER, COLORADO 80202

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Mr. Scott Raymond
Beaver Creek Coal Company
P. O. Box AU
Price, UT 84501

DIVISION OF
OIL, GAS & MINING

Dear Mr. Raymond:

As you requested on September 14, 1983, in telephone conversation with Louis Hamm of this office, I have enclosed copies of the responses to your proposed action received from other federal agencies to date. Understand that these responses address only those areas of the plan that each particular agency is responsible for, and any recommendations that are made are based solely upon having reviewed only those areas of responsibility. Any changes in your proposed action that are considered because of the enclosed comments should be discussed with the Utah Division of Oil, Gas and Mining prior to submittal.

We look forward to receiving your revised Gordon Creek No. 2 application so that your application review can proceed as close as possible to the original schedule. If you have any further questions, please call Louis Hamm or Walter Swain at (303) 837-3806.

Sincerely,

Stephen F. Manger
Task Force Leader

cc: James Smith, UDOGM ✓



IN REPLY
REFER TO:

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Utah State Office
2040 Administration Building
1745 West 1700 South
Salt Lake City, Utah 84104

U-8319
(U-921)

August 12, 1983

Memorandum

To: Western Technical Center Manager, OSM
Attn: Mr. Louis Hamm, Project Leader

From: Chief, Branch of Solid Minerals, State Office
BLM, Salt Lake City

Subject: ARCO Coal Company, Beaver Creek Coal Company,
Gordon Creek No. 2 Mine, Carbon County, Utah,
Mining and Reclamation Plan (MRP)



Mr. Manger's letter dated August 5, 1983, requested that this office submit a list of concerns for each of six permit applications, one of which is the subject plan. We have reviewed the material submitted to this office for this plan and the only remaining concerns we have are addressed in our comment letter dated April 27, 1983. Principally, this effort was to check out these concerns. Our comments follow:

1. In lieu of revising the unapproved resource recovery and protection plan (underground part of the permit application or MRP plan) as required by 30 CFR 211.10(b) effective August 30, 1982, furnish a cross-reference index showing where each specific part of the new 30 CFR 211.10(b) rules, effective August 30, 1982, can be found in the total submission of the permit application package.
2. Furnish a complete coal analysis for the Castlegte "A" seam as required by 30 CFR 211.10(b)(3)(i).
3. Submit a statement to be a part of the underground mining plan that is worded similar to the following: "The BLM is to be involved in and approve any changes in resource recovery or abandonment including portal sealing." We are asking for this statement to emphasize that the BLM is responsible to see that the resource will be fully recovered under existing economics, mining conditions, and available equipment. Basic concepts of multiple seam mining will be difficult if not impossible to apply in the Gordon Creek No. 2 mine because of the intricate pattern of geologic fault systems.

We have determined that the total permit application received in this office will obtain maximum economic recovery of the resource using current technology and available equipment. When the above three requested items are furnished by the company, we recommend, within our area of authority under the 30 CFR 211.10(b) rules effective August 30, 1982, that the underground mining plan part of the permit application be approved.

J. Gordon Whitney
Acting

U.S. FISH AND WILDLIFE SERVICE
1311 FEDERAL BUILDING
125 SOUTH STATE STREET
SALT LAKE CITY, UTAH 84138

September 2, 1983

MEMORANDUM

TO: Acting Deputy Administrator
Office of Surface Mining
Denver, Colorado
Attention: Don Henne

FROM: Field Supervisor, Ecological Services
Fish and Wildlife Service
Salt Lake City, Utah

SUBJECT: Review of Gordon Creek No. 2 Mine Plan, Beaver Creek Coal
Company (UT-0010, 0042 & 0043)

WESTERN TECHNICAL CENTER

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OSM-WTC

We have reviewed the Gordon Creek No. 2 mine plan for completeness and technical adequacy. We have, for the most part, found the plan complete and adequate in reference to the wildlife section and mitigation plan.

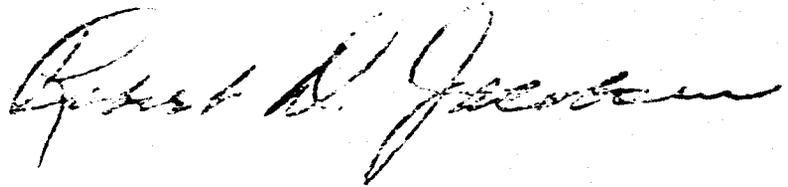
The mine and reclamation plan is well organized and has good quality wildlife maps within the text for easy reference. Habitat categories are well defined and the Company recognizes the importance of riparian habitat and has made a commitment to its protection (pp. 10-28 and 10-89).

A correction should be made in the fish and wildlife monitoring section and (10.7) of the plan. Page 10-94, number (3) states that the Fish and Wildlife Service (FWS) will conduct "spring surveys of the site... to identify any potentially active raptor nests". That information is incorrect. Service funding levels precludes this office from engaging in this type of activity. All necessary surveys and monitoring programs are the responsibility of Beaver Creek Coal Company.

A second issue that should be addressed in the plan is snow removal from the mine development area and the coal haul road. The FWS recommends that all snow removed should be stored above the sediment ponds (the ponds should be designed to handle additional storage) to prevent additional siltation or coal sediments from contaminating the affected drainages.

In conclusion, we have generally found the Gordon Creek No. 2 Mine and Reclamation Plan to be a good model to review other mine plans by. The Company has "done their homework" well and should be commended for it. Adequate literature review and site-specific inventories have been included. The mitigation plan addresses its commitments to wildlife issues specific to the mine plan area.

This completes our review of the Gordon Creek No. 2 Mine plan. We recommend approval of the plan in regards to meeting fish and wildlife needs. Please feel free to contact the FWS, Energy Operations staff in Salt Lake City, Utah (FTS-588-5649) if you have any further questions. Thank you for the opportunity to comment on the plan.



cc: OSM, Denver
DWR, SLC
DWR, Price
RO/HP, Denver