

0033



State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

Norman H. Bangerter
Governor

Dee C. Hansen
Executive Director

Dianne R. Nielson, Ph.D.
Division Director

355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203
801-538-5340

August 17, 1988

Mr. Clark Johnson, Field Supervisor
U. S. Fish and Wildlife Services
Ecological Services
2060 Administration Building
1745 West 1700 South
Salt Lake City, Utah 84104-5110

Dear Mr. Johnson:

Re: Powerline Inspections, Andalex Resources, Wildcat Loadout, ACT/007/033; and Beaver Creek Coal Company, Gordon Creek No. 2 and 7 Mine, ACT/007/016, Folder #2, Carbon County, Utah

The Division of Oil, Gas and Mining requests that you visit Andalex Resources' Wildcat Loadout and Beaver Creek Coal Company's Gordon Creek #2 and 7 Mine to determine whether or not powerpoles under mine company control are raptor-safe.

After your survey, please provide the Division with a letter documenting your findings. If modification is required, please provide specific recommendations which the Division can pass on to the operators.

I spoke with Lynn Kunzler, Division Reclamation Biologist, about the need for a powerline clearance survey for mines under his responsibility. He reported that none were needed.

Attached is:

- (1) a copy of a memo to John Whitehead recounting the history of transmission line-related correspondence for Gordon Creek #2 and 7 Mine, and

Page 2
Mr. Clark Johnson
ACT/007/016 and ACT/007/033
August 17, 1988

- (2) a copy of the U.S. Fish and Wildlife Service letter to Andalex Resources, which sparked my concern about powerpole safety at the Wildcat Loadout.

Thank you for your assistance in this matter.

Sincerely,



Brent A. Stettler
Reclamation Biologist

djh
Attachments
cc: D. Guy, BCCC
M. Glasson, Andalex
J. Whitehead
WP+/5-6



United States Department of the Interior

FISH AND WILDLIFE SERVICE
AREA OFFICE COLORADO-UTAH
1311 FEDERAL BUILDING
125 SOUTH STATE STREET
SALT LAKE CITY, UTAH 84138

Received

OCT 4 1984

IN REPLY REFER TO:

(ES)

October 3, 1984

Tower Resources Inc.

Mr. Allen D. Emmel
Environmental Coordinator
Tower Resources, Inc.
P.O. Box 902
Price, Utah 84501

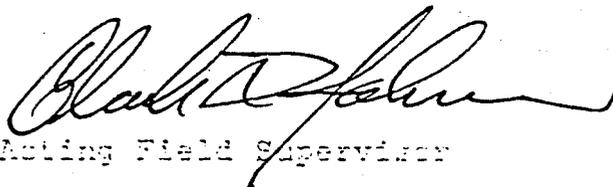
Dear Mr. Emmel:

We have reviewed the proposed design for your power transmission line at the Wildcat Junction railroad loadout and believe the design is generally satisfactory except for one needed modification.

We recommend that the ground wire have a 4 inch break 26-48 inches below the lowest conductor wire. As illustrated, some of the poles would have a close direct-line association between the conductor and a positive ground which could electrocute raptors attempting to perch on the insulator. This modification should reduce this hazard and still protect the system from lightning damage.

Please don't hesitate to contact us if we can be of further assistance.

Sincerely yours,


Blaine Johnson
Acting Field Supervisor

cc: ENR-Price
ELK-Price

UPL -



State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

Norman H. Bangarter
Governor

Dee C. Hansen
Executive Director

Dianne R. Nielson, Ph.D.
Division Director

355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203
801-538-5340

July 27, 1988

TO: John Whitehead, Permit Supervisor

FROM: Brent Stettler, Reclamation Biologist *Brent*

RE: Power Pole Configuration and Raptor Safety, Beaver Creek Coal Company, Gordon Creek #2 and 7 Mine, ACT/007/016, Folder #2, Carbon County, Utah

On July 6, 1984, the U.S. Fish and Wildlife Service (USFWS) sent correspondence to Mary Boucek of the Division of Oil, Gas and Mining (hereafter, Division) concerning the need for modification of power poles at the Gordon Creek #2 and 7 Mine. Jim Munson, USFWS biologist, was reported to have inspected powerlines on June 20, 1984. He found them inadequate for raptor protection. The powerline was described as an immediate threat to raptors and required immediate modification. The following recommendations were made:

1. Perch guards or elevated perches were to be constructed on all unsafe poles.
2. Corner power poles were to have covered or insulated jumpers installed to fuse cutouts, lightening arrestors, and transformers.
3. All transformer pods were to be equipped with perch guards.
4. Ground wires were to be gapped, both above and below the cross arms.

Apparently, as a follow-up, Mary Boucek mailed correspondence to Beaver Creek Coal Company (BCCC) on July 30, 1984, asking that power pole modifications be completed by August 15, 1984, which coincided with a deadline imposed by the Bureau of Land Management (BLM).

Page 2
Memo to J. Whitehead
ACT/007/016
July 27, 1988

On August 1, 1984, Charles Dunbar of BCCC mailed correspondence to David Mills, BLM biologist, stating that BCCC planned to proceed with proposed modifications, and would complete them by August 15, 1984.

Modification was apparently not completed, because at issuance of the Gordon Creek #2 mine permit on August 24, 1984, a special condition was imposed. Special Condition #10 stated that the permittee was to modify existing power poles within the southwest lease within 30 days of the effective date of the permit to raptor-proof designs specified by USFWS.

Modification to some extent appears to have occurred thereafter, because on September 28, 1984, a Division field specialist, Barton Kale, sent a memo to the Coal File that he had conducted a partial inspection of the Gordon Creek #2 Mine on August 28, 1984. The memo stated:

"Power poles that were inspected have been modified to become raptor-proof."

Just what that modification consisted of, and how many poles were involved, has been unclear. On March 23, 1987, the Office of Surface Mining (OSM), Albuquerque Field Office (AFO), commented that Gordon Creek #2 and 7 Mine may not have complied with Special Condition #10. The AFO requested that the powerline be evaluated to determine its adherence to the raptor-proof design standards.

The question was raised once again during an oversight inspection on April 21, 1987. Regulatory officials included Jim Fricke and Bill Malencik of the Division, and Henry Austin of the OSM. Mr. Austin asked about power pole modification and was told by Dan Guy that power poles had been inspected and found to be raptor-safe. In the inspection report, a letter from the USFWS was requested, attesting to the raptor-safety of the power poles. This letter was to be submitted to the Division by May 31, 1987. However, no such letter was found in Division files.

At mid-term review in 1987, Kathy Mutz asked BCCC to indicate in the MRP that power pole modification work had been completed. She obviously questioned whether or not it had been done.

Page 3
Memo to J. Whitehead
ACT/007/016
July 27, 1988

BCCC responded by referring the reviewer to the Mine Reclamation Plan (MRP), page 10-62, which related to a 1981 visit by USFWS biologists. They reportedly assessed the overall hazard to raptors as slight. On page 10-73, BCCC further contended that the electrocution hazard posed by some power pole configurations had been determined by USFWS raptor biologist, Ron Joseph, to not require corrective modification. However, no USFWS correspondence was provided to document statements made on either page.

The aforementioned documents leave a reviewer wondering what, if anything, was done to modify power poles, and how many were involved. If BCCC completed power pole modifications recommended by USFWS, then a new USFWS clearance survey must be completed. If not, modification must be implemented promptly, followed by a sign-off from the USFWS. In either case, an up-to-date USFWS letter, attesting to satisfactory design modification, must be submitted for inclusion into the MRP.

djh
cc: D. Guy, BCCC
C. Johnson, USFWS
1369R/32-34