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cc: LP BRAXTON
S Linnen
orig mine file



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

20 AUG 1985

RECEIVED

ACT/002/019A

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#2

Dr. Dianne Nielson, Director
Division of Oil, Gas and Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

DIVISION OF OIL
GAS & MINING

Dear Dr. Nielson:

The Office of Surface Mining (OSM) has reviewed the decision document and Cumulative Hydrologic Impact Assessment for Tower Resources' Centennial mine emergency lease. Enclosed are OSM's comments as discussed with your staff and annotated copies of the documents reviewed by OSM.

If there are any questions, please feel free to contact either Mark Humphrey or Rick Holbrook at (303) 844-3806.

Sincerely,

Richard E. Dawes
Allen D. Klein
Administrator
Western Technical Center

Enclosure

Findings Document

1. See annotated copy of the DOGM decision for minor corrections for findings No.'s 1, 1.A., 3.C. and 14.
2. Findings No.'s 6 and 8 should address violations and delinquent reclamation fees for other mines owned by this company (or parent company) outside the State of Utah.

Stipulations

3. If the applicant has not obtained NPDES permits, the acquisition of these permits should be required in Stipulation 817.50-(1)-DC.
4. The first phase of the first sentence in Stipulation 817.121-(1)-DD is unnecessary and should be deleted. Also, part A should specify the landowner indicated on the surface owner plot.

Technical Analysis

Introduction

5. The first paragraph should identify the surface ownership and mention whether the coal is all Federal coal or what portions are Federal, or Fee. (See annotated copy of the decision document for minor corrections.)

Cumulative Hydrologic Impact Assessment (CHIA)

6. The applicant is incorrectly referred to as "Tower Mine" instead of the name indicated in the application, "Centennial Mine".
7. Page 7, under Topography and Precipitation includes vegetation information which appears to be out-of-place or a heading missing.
8. The CHIA should identify the existing and proposed coal mines which are closest to the Centennial mines and discuss why the Centennial mines are hydrologically independent, in the context of cumulative hydrologic impacts, of these other mines. (See annotated copy of the CHIA for minor corrections.)