



United States
Department of
Agriculture

Forest
Service

Intermountain
Region

324 25th Street
Ogden, UT 84401

Reply to: 2820

Date: JUL 2 1992

Mr. James M. Parker
Utah State Director
Bureau of Land Management
P.O. Box 45155
Salt Lake City, UT 84145-0155

Dear Mr. Parker:

We have reviewed PacifiCorp's request for relinquishment of one complete Federal coal lease and portions of eight other Federal coal leases. Most of the areas proposed for relinquishment lie on Federal lands administered by the Manti-La Sal National Forest. Other portions involve BLM and non-Federal surface adjacent to the Forest. The subject coal leases are included in the Logical Mining Units (LMU) and permit areas for the Deer Creek, Cottonwood/Wilberg, and DesBeeDove Mines.

In concept we object to relinquishment of leases or portions of leases that have been mined since 1977 under approvals required by the Surface Mining Control and Reclamation Act (SMCRA). The LMU and permit area, even though administered by different agencies, should always coincide for consistency. Approvals for mining are often based on lease stipulations as well as mine plan provisions required by SMCRA and the Utah Coal Rules. Separating the two could result in confusion and premature loss of authority to enforce required mitigations.

We also object to relinquishment of existing leases which could be economically mined in an environmentally acceptable manner. Coal is a precious non-renewable resource that we cannot afford to waste. If portions of leases are truly not economical to mine due to limited reserves, poor quality, or geologic barriers, we would not object to relinquishment. However, increased mining costs alone should not be a reason for relinquishing existing leases and bypassing mineable reserves.

The following are our comments for specific leases. Our comments are restricted to those portions of the proposed relinquishments on National Forest System (NFS) lands.

ORIGINAL FILED IN

SL-050133



SL-050133 (entire lease on NFS lands)

This lease has not been mined to date. It is included in the LMU and permit area for the DesBeeDove Mine. PacifiCorp contends that this lease cannot be economically mined through the existing workings of the DesBeeDove Mine because it is isolated by a major fault and the coal outcrop and eastern Wasatch Plateau escarpment.

If BLM confirms that the lease cannot be economically mined, we have no objection to relinquishment. The lease has not been mined, therefore, lease stipulations are not necessary to enforce any specific measures required in the mine plan.

SL-066116 (entire lease on NFS lands)

PacifiCorp contends that the portion of the lease proposed for relinquishment has been mined-out and sealed.

We object to relinquishment as proposed. The lease has been mined. PacifiCorp is required to continue monitoring subsidence and hydrologic impacts under the mine plan and lease stipulations. Lease stipulations require mitigation of impacts to surface resources if they occur. This lease should remain in effect and part of the LMU and permit area until the mine is abandoned and the reclamation has been determined to be successful as required under SMCRA and lease terms.

SL-064607/064621 (NFS lands and BLM/non-Federal surface adjacent to the Forest)

PacifiCorp contends that this area has been mined-out and sealed. The maps show that only a portion of the relinquishment proposal which lies west of the Deer Creek fault has been mined.

If BLM confirms that the portion of the lease which lies east of the Deer Creek fault is not accessible and cannot be economically mined, we have no objection to relinquishment of this portion of the lease. We, however, object to relinquishment of that portion of the lease which lies west of the fault and has been mined. The lease and subject stipulations must remain in effect until the mine is abandoned and all SMCRA reclamation standards have been met.

SL-070645/U-02292 (entirely on NFS lands)

PacifiCorp contends that this area has been mined-out and sealed. We object to relinquishment of this lease. The lease and subject stipulations must remain in effect until the mine is abandoned and all SMCRA reclamation standards have been met.

U-02664 (entirely on NFS lands)

This lease ~~encompasses~~ two separate and detached parcels both of which are included in the LMU and permit area for the DesBeeDove Mine. PacifiCorp stated that this area has been mined-out and/or is isolated by a major fault and cannot be economically mined.

We object to relinquishment of the western parcel which has been mined out. This portion of the lease and subject stipulations must remain in effect until the mine is abandoned and all SMCRA reclamation standards have been met.

The eastern parcel is split by a north-south trending fault. We would not object to relinquishment of that portion of this parcel which lies east of the fault if BLM agrees that it would not be economical to mine the coal reserves in this area (see comments on SL-050133). The portion of this parcel which lies west of the fault should not be relinquished.

U-1358 (entirely on NFS lands)

This lease has been mined. Mining resulted in surface cracks and failure along the east escarpment of Grimes Wash adjacent to the portal facilities for the Cottonwood/Wilberg Mine. We object to relinquishment of this lease. Lease stipulations require subsidence monitoring of this area and mitigations needed to prevent hazardous conditions. Reclamation of the disturbance in this area could be required prior to abandonment of the mine. The lease and stipulations must remain in effect until the mine is abandoned and all reclamation has been successfully completed in accordance with SMCRA and lease terms.

U-47978 (NFS lands and BLM lands adjacent to the Forest)

Mineable reserves have been recovered and remaining reserves were abandoned due to burned coal. Some escarpment failure has occurred and PacifiCorp is monitoring subsidence and surface cracks. Reclamation might be required depending on the results of subsidence monitoring and monitoring of surface cracks. This lease must remain in effect until the mine is abandoned and it is determined that reclamation has been successfully completed in accordance with SMCRA and lease terms.

U-47979 (NFS lands and BLM lands adjacent to the Forest)

PacifiCorp has stated that this portion of the lease is faulted and burned and is not economical to mine. According to the mine map, this area has not been mined.

We would not object to relinquishment of this portion of the lease if BLM determines that it would not be suitable for mining, considering economic and environmental factors. It lies along the north slope of the North Fork of Meetinghouse Canyon, between the Pleasant Valley Graben and the outcrop along the east escarpment of the Wasatch Plateau.

U-024319 (entirely on NFS lands)

PacifiCorp has stated that this portion of the lease is faulted and contains burned coal, making the area non-economical to mine. According to the mine map, this area has not been mined.

We would not object to relinquishment of this portion of the lease if BLM determines that it would not be economical to mine the reserves.

If you have any questions, please call Steve Robison of our minerals staff at (801) 625-5663.

Sincerely,



E. R. BROWNING
Director
Minerals Area Management