

0004



State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF WILDLIFE RESOURCES

Norman H. Bangert
Governor
Dee C. Hansen
Executive Director
Timothy H. Provan
Division Director

1596 West North Temple
Salt Lake City, Utah 84116-3195
801-538-4700
801-538-4441 (Fax)

Original CEP 007/038 #2

CC: PFO
R. Summers
J. Smith

RECEIVED

SEP 11 1992

DIVISION OF
OIL GAS & MINING

September 3, 1992

Mr. Mike Herkimer
Utah Department of Environmental Quality
Division of Water Quality
P.O. Box 16690
Salt Lake City, Utah 84116

Dear Mike:

The Division of Wildlife Resources has reviewed Cyprus Coal Company's application for a permit to discharge into Willow Creek during an exploration program of the Castlegate No. 2 Mine and various abandoned mines in the Kenilworth area. We have the following comments and recommendations regarding this application.

The Division is concerned about any potential degradation of Willow Creek. The fishery in this drainage is already far below its potential. Many factors have contributed to this degradation. Siltation, due to the destruction of the riparian zones, erosion, and grazing practices, is the main concern. It is our objective to restore and improve this drainage in order to upgrade the fish and wildlife habitat. We would like to minimize any further degradation that may occur as a result of this project. This can be accomplished through responsible placement of sediment traps and appropriate monitoring of all discharges.

Our primary concern is the potential discharge of a significant amount of water from Point 004 as a result of groundwater pumped from the reopened mine. Without knowing the exact amount of water to be discharged or the quality of that water, it is difficult to predict the impacts to wildlife. The amount of water, as well as the quality of water, discharged could result in impacts to the stream channel and aquatic life. Water quality should be closely monitored and discharged water should meet water quality standards. Activities associated with this discharge should not increase background NTU levels by more than 10 percent. Care should be taken as water is pumped so that bottom sediments, which could potentially contain pollutants, are not included. No mention is made of utilizing sediment traps to treat this discharge. We recommend that two sediment ponds, used in sequence, be utilized to help ensure the quality of water discharged. This will also help to regulate flows so that a significant flow increase is not

Mr. Mike Herkimer
September 3, 1992
Page 2

experienced in Willow Creek. Variable flows occurring outside natural fluctuations can have an adverse effect on fisheries.

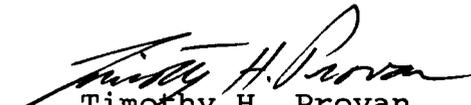
In addition, water should be tested for soluble pollutants. Petroleum products or other chemicals used in mining may have remained inside the mine when it was sealed. These substances could have contaminated the groundwater. If tests reveal that such contamination has occurred, methods other than sediment ponds would be required to treat the water before it is discharged. The Division would like to be informed of the results of water quality tests.

We are also concerned over potential impacts to riparian areas that could result from the placement of sediment traps at Points 001, 002, and 003. Riparian zones provide critical habitat for a wide variety of terrestrial and aquatic wildlife. Any destruction of this habitat type that may occur from the construction of sediment traps would be considered a significant impact. Additionally, some reclamation work has already occurred at the sites and disturbance of these efforts should be avoided. To minimize impacts to this crucial wildlife habitat, we recommend that the sediment traps at the three sites be placed outside of the riparian zone. Water from the traps should be discharged at an appropriate rate to avoid impacts on the stream channel and aquatic life.

We do not anticipate any significant impacts to water sources or wildlife from the methods proposed to control runoff sediments at Points 005, 006, or 007. The area treated by these locations contains only intermittent streams and supports no fisheries.

We appreciate the opportunity to comment on this action. If you have any questions regarding our comments, please contact Ken Phippen, Regional Habitat Manager (637-3310).

Sincerely,


Timothy H. Provan
Director