



STATE OF UTAH
NATURAL RESOURCES
Oil, Gas & Mining

Norman H. Bangerter, Governor
Dee C. Hansen, Executive Director
Dianne R. Nielson, Ph.D., Division Director

355 W. North Temple • 3 Triad Center • Suite 350 • Salt Lake City, UT 84180-1203 • 801-538-5340

August 5, 1986

Mr. Allen Childs
Trail Mountain Coal Company
P.O. Box 370
Orangeville, Utah 84537

Dear Mr. Childs:

RE: Other Agency Comments, Initial Completeness Review,
Trail Mountain Coal Company Tract II, ACT/015/009, Folder #2,
Emery County Utah.

Enclosed please find comments from other agencies involved in the review of the Tract II application. As you will recall, the Division's letter of March 27, 1986 advised that no response be submitted until the other agency comments were received. After consideration of the comments attached, please respond to all comments formulated by the Division and other agencies.

Thank you for your cooperation in this matter, please feel free to contact me if you should have any questions on this matter.

Sincerely,

John J. Whitehead
Permit Supervisor/
Reclamation Hydrologist

jvb
Encs.: SHPO Letter (4-8-86)
DWR Letter (4-21-86)
BLM Letter (5-19-86)
OSM Letter (6-02-86)
USFS Letter (7-07-86)

cc: P. Grubaugh-Littig
0844R-20



STATE OF UTAH
 NATURAL RESOURCES
 Wildlife Resources

*orig minefile
 cc J. Whitehead*

Norman H. Bangertter, Governor
 Dee C. Hansen, Executive Director
 William H. Geer, Division Director

1596 West North Temple • Salt Lake City, UT 84116-3154 • 801-533-9333

April 21, 1986

RECEIVED
 APR 21 1986

DIVISION OF
 OIL, GAS & MINING

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

Attn: John Whitehead

Dear Dianne:

The Division has evaluated Trail Mountain Coal Company's January 20, 1986 Tract 2 lease addition to the Trail Mountain Mine.

Page 17, last paragraph -- Since this coal will be accessed via existing facilities and no new surface facilities are to be developed, our concerns relate only to subsidence. There are numerous springs associated with the new lease area and they are of critical value to local wildlife. A substantial impact will be realized if daily flows at a seep or spring are diminished due to mining related action by 50% between April 1, and October 31 of any year.

Are there areas where potential subsidence from mining could impact an existing cliff raptor nest? If so, the MRP must identify such and mitigation methodology. To date no nests are known in Tract 2.

Thank you for an opportunity to review the MRP and provide comment.

Sincerely,

William H. Geer
 William H. Geer
 Director

RECEIVED
APR 17 1986

DIVISION OF
OIL, GAS & MINING

April 8, 1986

John J. Whitehead
Permit Supervisor/
Reclamation Hydrologist
Division of Oil, Gas & Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

RE: Tract 2 Lease Addition, Diamond Shamrock's Trail Mountain Coal Company, Trail Mountain Mine, ACT/015/009, #3, Emery County, Utah

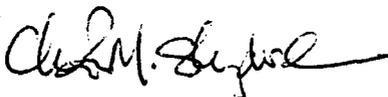
In Reply Please Refer to Case No. G828

Dear Mr. Whitehead:

The staff of the Utah Preservation's Office has reviewed the copy of Diamond Shamrock's Trail Mountain Coal Company's plans for adding new lease acreage to the Trail Mountain Mine. From our review of this report, it appears that no surface disturbances are planned for this project, and that the D&RG survey indicated that no cultural or historic sites were located in the project area. We have no additional comments on this project at this time.

Since no formal consultation request concerning eligibility, effect or mitigation as outlined by 36 CFR 800 was indicated by you, this letter represents a response for information concerning location of cultural resources. If you have any questions or concerns, please contact me at 533-7039.

Sincerely,



Charles M. Shepherd
Architectural Conservator
Office of the State Historic
Preservation Officer

CMS:jrc:G828/2785V



NORMAN H. BANGERTER
GOVERNOR



STATE OF UTAH
DEPARTMENT OF COMMUNITY AND
ECONOMIC DEVELOPMENT

Division of
State History
(UTAH STATE HISTORICAL SOCIETY)

MELVIN T. SMITH, DIRECTOR
300 RIO GRANDE
SALT LAKE CITY, UTAH 84101-1182
TELEPHONE 801 / 533-5755

orig mine file
cc. L. Robinson



United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Moab District
P. O. Box 970
Moab, Utah 84532

3482
U-082996
U-49332
(U-067)

RECEIVED MAY 19 1986
MAY 20 1986

Memorandum

DIVISION OF
OIL, GAS & MINING

To: Senior Project Manager for Utah, Office of Surface Mining, Denver

Attention: Richard Holbrook

From: District Manager, BLM, Moab

Subject: Trail Mountain Mining and Reclamation Plan, Tract 2 (UT 0017)

We have received the subject plan consisting of 2 volumes on April 16, 1986 and have reviewed it with regards to land uses administered by the BLM and the adequacy of the resource recovery and protection plan (R²P²). The submitted plan is an amendment to the original permit application package (PAP), referenced UT 0017, and approved by the Assistant Secretary on December 14, 1984. Soon after approval, the complete plan on file in our Salt Lake State Office was transferred to the San Rafael Resource Area (in Price, Utah) of the Moab District, where field engineers responsible for on-ground lease administration would have access to the complete plan. It was decided once the mine plan is approved and sent to field offices that any revisions, changes or additions to the R²P² would be reviewed and commented on at the District level. We, therefore, are addressing items checked for both the Branch of Solid Minerals (BSM) BLM and Federal Land Managing Agency (FLMA).

The subject tract is entirely on National Forest land requiring no response to land use conflicts and protection of nonmineral resources by the BLM.

With regard to the R²P², we have reviewed the mining layout and operational sequencing. Trail Mountain is adding to the original permit a newly acquired emergency Federal coal lease U-49332 located directly west and adjoining the present permit area. All access to the lease will be from adjacent underground mine workings located in the present permit area. Present surface facilities will be used. The plan meets the requirements of the 43 CFR 3482.1(c) rules and regulations. We have determined that the proposed coal recovery procedures will safely obtain maximum recovery of the coal resource within the plan area using the equipment and technology proposed. Within the limits of our authority, we approve the R²P² and recommend the subject plan be approved.

/S/ GENE NODINE

cc:
Diamond Shamrock Trail Mountain Coal Co.
DOGM
USO (U-921)



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

John Whitehead
~~John Whitehead~~
John Whitehead

02 JUN 1986

RECEIVED
JUN 04 1986

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 Reclamation and Enforcement (OSMRE) has received the March 11, 1986, permit revision for Trail Mountain Coal Company's Trail Mountain mine. OSMRE has completed an initial review of this submission.

The initial review identified the need to expand the applicant's legal and financial compliance section to include officers and directors and their addresses for the principal share holder, "Natomas Coal Company". OSMRE will be conducting an investigation of the applicant and operator for compliance with Section 510(c) of the Surface Mining Control and Reclamation Act and will advise you of the results of that investigation.

Utah Division of Oil, Gas and Mining (DOG M) should inform OSMRE of the bond amount to be set for the Trail Mountain mine or if the existing bond is adequate.

OSMRE has received concurrence from the Bureau of Land Management (BLM) that the Trail Mountain mine mining plan will be in compliance with resource recovery and protection plan requirements (copy enclosed). However, since the Tract 2 revision area is entirely on national forest land, BLM was unable to make a judgement regarding land use conflicts and protection of non-mineral resources.

The U.S. Forest Service (USFS) has informed OSMRE that their review of the Tract 2 revision for the Trail Mountain mine will be completed in mid-June. Upon receipt of the review by the USFS, OSMRE will provide DOGM with the comments.

If you have any questions, please contact Vernon Maldonado at (303) 844-2874 or Richard Holbrook at (303) 844-2896.

Sincerely,

Allen D. Klein
Allen D. Klein
Administrator
Western Technical Center

Enclosure

cc: R. Hagen, OSMRE-AFO



United States Department of the Interior WTC

BUREAU OF LAND MANAGEMENT
Moab District
P. O. Box 970
Moab, Utah 84532

1986 MAY 21 AM 8:51
WESTERN TECHNICAL CENTER

3482
U-082996
U-49332
(U-067)

MAY 19 1986

Memorandum

To: Senior Project Manager for Utah, Office of Surface Mining, Denver

Attention: Richard Holbrook

From: District Manager, BLM, Moab

Subject: Trail Mountain Mining and Reclamation Plan, Tract 2 (UT 0017)

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The subject tract is entirely on National Forest land requiring no response to land use conflicts and protection of nonmineral resources by the BLM.

With regard to the R²P², we have reviewed the mining layout and operational sequencing. Trail Mountain is adding to the original permit a newly acquired emergency Federal coal lease U-49332 located directly west and adjoining the present permit area. All access to the lease will be from adjacent underground mine workings located in the present permit area. Present surface facilities will be used. The plan meets the requirements of the 43 CFR 3482.1(c) rules and regulations. We have determined that the proposed coal recovery procedures will safely obtain maximum recovery of the coal resource within the plan area using the equipment and technology proposed. Within the limits of our authority, we approve the R²P² and recommend the subject plan be approved.

cc:
Diamond Shamrock Trail Mountain Coal Co.
DOGM
USO (U-921)

United States
Department of
Agriculture

Forest
Service

Manti-LaSal
National Forest

599 West Price River Drive
Price, Utah 84501

Mine File ~~1067A~~
J. Whitehead

Reply to: 2820

Date: July 7, 1986

Rick Holbrook
OSM-Reclamation and Enforcement
Brooks Towers
1020 15th Street
Denver, Colorado 80202

RECEIVED
JUL 10 1986

DIVISION OF
OIL, GAS & MINING

Dear Mr. Holbrook:

The Manti-LaSal National Forest has completed its review of the Trail Mountain Mine Tract 2 Mining and Reclamation Plan which consists of two volumes. In addition to site specific comments, the MRP needs to be reviewed for typo's.

- o Chapter 1, Page 2 - Trail Mountain Coal Companys' Trail Mountain Mine is located in Cottonwood Canyon, 12 miles west of Orangeville, Utah [See figure 1-1]
A Figure 1-1 cannot be found in Chapter 1.
- o Chapter 1, Page 5 - The reserves from the Tract 2 lease will provide for the continuation of the Trail Mountain Mine mining operations for a maximum of eleven years at an annual production rate of 450,000 tons of coal.
Chapter 1, Page 6 - Life of reserves is approximately 10 years (at current contractual commitments).
Is the mine life ten years or eleven years?
- o Chapter 1, Reviewers Checklist - The outline section needs to have complete titles, and there are no page numbers.
- o Chapter 2, Page 14 - A map depicting the legal boundries is presented in Figure 2-1.
A Figure 2-1 cannot be found in Chapter 2.
- o Chapter 3, Page 15 - The United States Forest Service and the State of Utah have classified the Tract 2 permit area as suitable depressed non-developed recreation, forestry and mining.
It is not clear as to the meaning of this statement. Clarification is needed.

Chapter 3, Page 16 - There are no major surface streams or seeps in the Tract 2 permit area therefore the applicant proposes that there will be no impacts from mining on the hydrologic balance.

The applicant needs to consider T-10 and T-14 seeps/springs located within the permit area, and those additional seeps/springs located down-dip from and adjacent to the permit area as shown on Figure 7-1.

Chapter 3, Page 17 - Insert the word gallon between 2000 and guzzler.

Chapter 3, Page 20 - The minimal disturbance caused by potential subsidence will have no sufficient impact and may in fact increase forage production.

The Forest Service has no reason to believe or expect that disturbances to the surface or subsurface resources which can be directly related to subsidence will be minimal. Minimal is a vague word and should be quantified. Without knowing the rate the surface is subsiding and the environmental consequences, there is no validity to the no significant impact statement. If it is merely an opinion, and cannot be substantiated by facts and figures, it should be deleted.

What assumptions are used to substantiate the above quoted statement dealing with forage production? Forage production may be decreased. If facts and figures cannot support the statement, it should be deleted.

Chapter 3, Appendix 3 - We request that the draft Forest Plan For Studying The Effects Of Underground Coal Mining on Surface and Subsurface Resources be deleted from the Tract 2 MRP. Once the Plan is finalized, it will be furnished to the appropriate mining companies and regulatory agencies.

Chapter 4, Page 3 - No oil and gas leases are held within the Tract 2 mine plan area.

Our records indicate that the Tract 2 permit area is entirely blanketed by two oil/gas leases, U-24355 and U-15197.

Chapter 4, Page 3 - Existing land uses on the Trail Mountain Tract 2 mine plan areas and adjacent areas consist of grazing, wildlife habitat and to a small extent recreation.

Figure 4-3 indicates that the only land uses for the permit area and adjacent areas are range and pasture land. The map and narrative in Chapter 4 need to include the other important land uses such as minerals, watershed, timber lands, and hunting activities.

Chapter 4, Page 3 - Limited big game hunting does occur.

There is an extensive amount of big game hunting in the Trail Mountain area. In addition to the regular elk and deer hunts, there is a post season elk hunt which is now becoming a regular annual event. This regional land use section also needs to consider the oil and gas activities just a short ways up the canyon.

Chapter 4, Page 5 - The Cottonwood portal Wilberg Mine has not yet begun operation although some construction has occurred.

The portal in Cottonwood Canyon needs to be distinguished from the portal for the Cottonwood Mine.

Figure 4-2 - Surface, Coal, and Oil/Gas Ownership Map

Label the 80 acre Federal coal lease in Straight Canyon SL-036407.

Delete the caption Forest Service Straight Canyon Withdrawal Area.

The Figure needs and explanation.

What is the significance of the heavy dashed line?

Figure 5-1 - The map needs to be updated to show the boundary of Tract 2.

Chapter 7, Page 4 - The geologic controls on springs in the Tract 2 area are depicted in a generalized way in the block diagram, Figure 2.

We assume you are actually referring to Figure 7-2.

Chapter 7, Page 8 - Inflows to the mine are projected to be insufficient to require dewatering. Hence, impacts due to dewatering will be nonexistent. The water supply for use at the mine (culinary and domestic) is obtained from Cottonwood Creek.

If the above statement dealing with impacts is fact and not opinion, they need to be discussed. If it is an opinion, it should be made clear it is just an opinion, or be deleted.

This section needs to include a discussion on the proposed development of a water well at the mine portal for both culinary and domestic use. This proposal was published in the local newspaper during February 1986.

This comment also applies to Section 7.2.3.1.

Figure 7-2 - There needs to be an explanation with the map to clarify the map symbols and stratigraphic symbols used.

Chapter 10, Page 3 - The only potential native impact....

Change the word native to negative.

- o Chapter 10, Page 9 - The aquatic macroinvertebrate wildlife found on site in Cottonwood Creek.....were taken above the portal and loadout facilities and indicate a healthy stream. The take.....below the portal and loadout facilities.....are indicative of an unhealthy habitat.

If the above statements are true, then we request that appropriate action be formalized immediately and taken to rectify the degradation of the water quality.

- o Chapter 11, Page 1 - The elevation of the portal is incorrectly identified as being 21,000 feet. It should be approximately 7,200 feet.

In addition to the many comments, we want to remind the operator and the Federal and State regulatory agencies involved in the permitting of Tract 2 that the lease stipulations are still in effect. Any proposed mining or exploration activities have to be conducted within the guidelines outlined in the Special Conditions of the lease terms.

If there are any questions, please contact us.

Sincerely,

/s/ William H. Boley

for
REED C. CHRISTENSEN
Forest Supervisor

cc: Trail Mtn. Mine
DOGM
D-2
S. Hotchkiss