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J. Whitehead
~~L. Braxton~~ Mine file
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United States
Department of
Agriculture

Forest
Service

Manti-LaSal
National Forest

599 West Price River Drive
Price, Utah 84501

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DIVISION OF
OIL, GAS & MINING

Reply to: 2820

Date: March 10, 1987

Richard M. Holbrook
Office of Surface Mining
Reclamation and Enforcement
Brooks Towers
1020 15th Street
Denver, Colorado 80202

Dear Rick:

We have reviewed the Trail Mountain Coal Co. Tract II PAP with the December 1, 1986, and January 22, 1987, completeness deficiency responses.

We have the following comments on the revised PAP:

1. Chapter 1, Reviewers Checklist

   This section needs to have complete titles and page numbers to show where the materials can be found.

2. Chapter 2, Page 14

   A map depicting the legal boundaries is present in Figure 2-1.

   There is no Figure 2-1. The reference is apparently Table 2-1 which is Figure 4-2 as discussed in the Chapter 2 Table of Contents.

3. Chapter 2, Appendix 3 - Tract 2 Lease

   Only the first page of the lease is included. The entire lease with the stipulations should be included.

4. Chapter 3, Appendix 1 - Reserves

   There is only a cover page in the appendix. We obtained the appendix directly from Trail Mtn. Coal Co. This material was apparently sent to OSM/DOGM with other materials at the beginning of February. The Forest has not yet received these materials.

5. Chapter 3, Section 3.3.7

   The Tract 2 Mine Plan Area of the Trail Mountain Mine is outlined in figure 3-10.

   Figure 3-10 is the typical portal seal. Figure 3-9 shows the permit area.

6. Chapter 3, Section 3.4.3, Page 17

A discussion of probable Hydrological Consequences of the Tract 2 area is contained in Appendix 7-F of Chapter 7.

There are no materials in this appendix. We obtained the materials from Trail Mtn. Coal Co. for our review.

7. Chapter 3, Section 3.4.5.1, Page 20

If mining and subsidence can be expected to impact ground and surface water and soils as stated in the PAP, then it seems logical that there is potential for impacts to vegetation and forage production. This needs to be discussed.

8. Figure 4-2

This map is confusing and is not accurate. All of the Trail Mountain Lease Tract, as shown on the map, is labelled as being on the National Forest. That portion shown in Section 6, T.18S., R7E., SLM, Utah is outside the Forest boundary.

All of Tract I is labelled as being on State land. That portion of Tract I described as the E1/2 E1/2 SW1/4, SW1/4 SE1/4, Section 25, T17S., R6E., SLM, Utah is National Forest System land.

9. Figure 7-1

Spring's TM-21 and TM-22 are referred to as TM-8 and TM-9 in Chapter 7, Page 5 in the discussion on developed springs. The map or text should be corrected.

The map shows that T-15 has been developed with a trough. This spring is not listed as developed on Page 5. The text needs to be corrected. T-0, T-16 and T-17 have been developed with ponds. The map needs to be corrected by adding a "D" above the spring and the text needs to be corrected to indicate that these have been developed.

The geology of the area should be shown on this map to show which formations the springs lie within and to better display the interrelationships between geology and hydrology.

10. Chapter 7, Section 7.1.3.1, Page 6

Water rights have been filed by the Forest Service for several of the springs. This section needs to be updated.

11. Appendix 7-1

The information in the Use and Notes column is not consistent with Figure 7-1 nor the Chapter 7 text on Page 5. This needs to be corrected. See Comment No. 9.

12. Appendix 7-D(7)

The heading for the column that shows the quantity of water pumped each month, shows that the quantity is gallons x 100. The numbers indicate that the factor of 100 is incorrect.

13. Chapters 3 and 9 - Vegetation

Threatened, endangered and sensitive plan species are not addressed anywhere in the PAP. Sensitive species Hedysarium occidentale var. canone has been identified at several locations within the Tract 1 area. It is suspected that this plant is also located in the Tract 2 area. Sensitive plan Hymenoxys helenoides is also suspected to occur within the Tract 2 area.

14. Chapter 3, Section 3.4.1, Page 16

At several locations throughout the PAP the Ferron-Price Land Management Plan is referenced. This Plan has been superseded by the Manti-LaSal National Forest Final EIS and Land and Resource Management Plan, 1986. The discussion on land use is not totally correct. Hunting should be changed to Big Game Winter Range and Watershed should be added to be consistent with the Plan.

We have not received a draft TA or EA for review. In addition, it is our understanding that Trail Mountain Coal Co. has submitted more revisions to complete the PAP. Please send these materials for our review and consideration of consent to the Tract II Mine and Reclamation Plan.

Sincerely,

/s/ William H. Boley

for
REED C. CHRISTENSEN
Forest Supervisor

cc:
D-2
L. Braxton - UDOGM
A. Childs - Trail Mountain Coal Co.
C. Reed