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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

January 29, 1987

Mr. Allen P. Childs  
Mine Engineer  
Trail Mountain Coal Company  
P.O. Box 370  
Orangeville, Utah 84537-0370

Dear Mr. Childs:

RE: Tract 2 Permit Area MRP; Trail Mountain Mine, Emery County,  
ACT/015/009, Folder #2

In order to address the concerns expressed by the Division of Wildlife Resources (see attached letter) and discussed in our phone conversation (1/28/87), please revise the MRP to indicate the following:

1. The most recent raptor survey of the Tract 2 area was conducted by UP&L Mining Company in cooperation with the USFWS in May of 1986. The survey did not find any raptor nests within the Tract 2 area, specifically on the cliffs which will be undermined.
2. Your plan to survey the cliffs each spring to determine if new nests are established. Negative results of the survey could be transmitted to the Division with your annual report. Any new nests should be immediately reported to the Division in order to determine if any action should be taken.
3. Commitment to consult with the USFWS and DWR for mitigation measures if new nests are located.
4. The potential impact from escarpment failure is indicated on Chapter 10, page 3 and Chapter 3, page 22. A short explanation of why cliff subsidence is unlikely (i.e. single seam mining, no pillar pulling) would clarify DWR's question in paragraph two of the letter. Please clarify on these pages or cite other descriptions in the MRP.
5. Figure 12-5, listed on the chapter 12 table of contents (revised 1/10/87) is not in the MRP. Is it part of Appendix 6, still to be submitted? Please send two copies if available now.

Allen Childs  
January 28, 1987  
Page 2

Another detail:

6. If Cottonwood Creek macroinvertebrate studies are to be discontinued, please supply a revised page for the Tract 1 MRP indicating that they will not be conducted in the future and cite the DWR 11/25/86 letter that you included in the Tract 2 MRP.

I appreciate your cooperation in clearing up these details.

Sincerely,



Kathryn M. Mutz  
Reclamation Biologist

Enclosure  
cc: J. Whitehead  
L. Dalton, DWR  
0531R-35



STATE OF UTAH  
NATURAL RESOURCES  
Wildlife Resources

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

December 29, 1986

~~RECEIVED~~  
JAN 05 1987

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 November 21, 1986 updated Mining and Reclamation Plan for Tract 2 lease addition to the Trail Mountain Mine.

Page 22, Second paragraph - 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. If a raptor nest were to occur, loss due to subsidence is considered to be substantial.

Appendix 7-E, Macro Invertebrate Study (Cottonwood Creek) - The differences in substrate and vegetation overstory between the two sample sites is substantial. This diminishes our ability to evaluate differences between control and experimental (potential impact area) data. The small number of replicate samples would also confound an evaluation if the control and experimental sites were more closely matched.

Considering that control and experimental sites each showed diversity indices suggestive of polluted systems and the biotic index showed the experimental and control to be slightly stressed, mining is not likely a measurable influence on the stream system. As a result, we concur with the author that additional studies relative to mining are not necessary.

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

Sincerely,

William H. Geer  
Director

~~RECEIVED~~  
J. Whitehead  
Trail Mine file  
[Signature]

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