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M. E. Eib 015/00942  
K. Smith

United States  
Department of  
Agriculture

Forest  
Service

Manti-LaSal  
National Forest

599 West Price River Dr.  
Price, Utah 84501

Reply to: 2820

Date: March 30, 1989

**RECEIVED**  
APR 07 1989

Lowell Braxton  
State of Utah Natural Resources  
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**

RE: Recompiled Mining and Reclamation Plan, Beaver Creek Coal Company, Trail Mountain #9 Mine, ACT/015/009, Folder #2, Emery County, Utah

Dear Lowell:

We have reviewed the recompiled Mining and Reclamation Plan, approved by the Division on December 14, 1988, for consistency with the previous approved plan and have the following comments:

1. Figures 3-6 and 3-8

Figure 3-6 shows an area of "Limited Second Mining" on National Forest System lands beyond the 15 degree angle-of-draw from the Castlegate Sandstone outcrop. Figure 3-8 shows this same area as "First Mining Only."

On page 3-15, the MRP states "In order to protect the canyon wall on the east side of the South Mains, a limited percent (56-63%) will be removed." Another sentence further down the page states "The same barrier pillars and the South Mains will only be partially pillared in order to protect the canyon walls." The old plan states that there will only be first mining beyond the 15 degree angle of draw. This was amended in 1988 to allow limited second mining on the State lease.

Please reference our letter to your office, dated March 10, 1988. In this letter we stated that we would not consent to limited second mining beyond the angle-of-draw zone under the escarpment on National Forest System lands, until it can be demonstrated that escarpment failure will not result. We also stated that we would re-evaluate this position based on results of limited second mining on the State lease. We feel that Figure 3-6 and the narrative need to be revised to make it clear that, at the present time, only first mining has been approved on National Forest System lands beyond the angle-of-draw zone under the escarpment.

2. Appendix 7-9

The 1981 Spring Inventory and 1985 Spring Inventory materials are missing from our copies of the plan.

3. Appendix 8-3 (Editorial)

There is no text for the Post-grading Sampling Program.

4. Appendix 9-1

- a. On page 5, it is stated, "The water, fuel and sewer systems of the mine site will be sealed, capped and covered." There is no indication that the systems will be drained, cleaned-out, and legally prepared for burial.
- b. On page 6, in the discussion on reclaiming the sediment pond, the plan states "Any remaining sediments will be placed at the toe of the highwall and covered by at least four feet of fill material." There is no indication that the sediment pond materials will be tested for acid-forming or toxic materials prior to burial. This needs to be considered before burial.
- c. The old mine plan contained vegetative maps for both Tract 1 and Tract 2 areas. The new consolidated plan has excluded the vegetative map of the Tract 2 area. This map needs to be added to the consolidated plan.
- d. There is a section of text missing at the end of page 17-D.

Items 1, 4a, 4b, and 4c need revisions or additions. The remaining comments are of an editorial nature only.

If you have any questions, please contact the Forest Supervisor's Office in Price, Utah.

Sincerely,

  
for  
GEORGE A. MORRIS  
Forest Supervisor