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State of Utah
DEPARTMENT OF NATURAL RESOURCES
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DIVISION OF
OIL, GAS & MINING

December 7, 1990

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Dr. Dianne Nielson, Director
Utah Division of Oil, Gas & Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, UT 84116

Dear Dianne:

The Division has reviewed Beaver Creek Coal Company's responses to the Initial Completeness Review for their Trail Mountain #9 Mine. We are concerned about the effects of mining to the water sources of the area.

Subsidence can result in drying up of impounded water bodies or modification to flows at seeps, springs, perennial or even intermittent channels. Such an impact can have serious consequences to a local area's wildlife in that drinking water may become reduced in value or unavailable to terrestrial animals. All water sources are considered of critical value for wildlife and should be protected. Section 3.3.2.2 (page 3-3) addresses the drainage at the southwestern end of the lease. Regardless of whether the stream is perennial, intermittent or ephemeral in nature, the flows must be protected or mitigated by replacement of the water.

The same holds true for seeps or springs in the area (Section 3.3.3.1, page 7-13). Seeps or springs providing flow during periods when wildlife are present represent a critical valued resource to all of the local area's wildlife. This includes the wide array of species that have small and limited home ranges. As a result of their small home range size, the animal does not have the physical capability of "packing his bag" and moving to another area of acceptable habitat. Those few species that have such a physical capability usually find the home ranges in adjoining areas already filled to capacity.

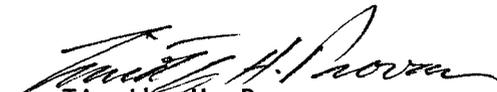
In the event that coal mining results in subsidence that impacts the flows at seeps and springs, mitigation is anticipated. An impact would be deemed substantial if the daily flow from a seep or spring was reduced by 50% or more. Mitigation that would be expected is simply the replacement of the

Dr. Dianne Nielson
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water. Unquestionably, there would be many techniques that could achieve this goal, but guzzlers are considered to be the most effective technique. They should be fenced with a 3-rail/pole fence having a maximum height of 42 inches. Clearance between the ground and the bottom pole, as well as space between the top two poles, should be at least 14 inches. This will allow passage of wildlife while disallowing domestic livestock.

Thank you for the opportunity to provide comment.

Sincerely,


Timothy H. Provan
Director