



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

State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203
801-538-5340

March 14, 1991

TO: Pamela Grubaugh-Littig, Permit Supervisor

FROM: Tom Munson, Senior Reclamation Hydrologist 

RE: Trail Mountain #9 Mine Lease Permit Application, Beaver Creek Coal Company, ACT/015/009, Folder #2, Emery County, Utah

Synopsis

The response to the 2nd Technical Deficiency Review on the Trail Mountain #9 Mine Lease Permit Application was received on March 12, 1991. This memo will address this response corresponding to our technical deficiency review.

Analysis and Recommendations

R614-301-725 Baseline Cumulative Impact Area Information

- 1) The water rights are shown on Figure 7-9. Any water rights identified on Figure 7-9 but not included in past spring and seep surveys must be verified by the Forest Service, Beaver Creek Coal Company, and the Division prior to any mine related impacts and water monitoring would commence two years prior to potential impact from subsidence. All sources of water will be verified in the 1991 survey committed to in the PAP already.
- 2) This comment has been adequately addressed in section 7.2.1 of the PAP and on page 7-18a. The geologic occurrence of all springs and seeps monitored was identified in Appendix 7-1 (L).
- 3) The 1991 survey will verify the presence or absence of perennial flow in all drainages within or adjacent to the permit area and subsequent determinations of subsidence protection will be made following this survey by July 1, 1991.

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- 4) All drillhole data has indicated no evidence of significant aquifers. Since the drill holes were greater than 2000 feet in depth, this data will be considered with caution and therefore an adequate mitigation plan will be required to mitigate any major in-mine flows of groundwater and subsequent discharges to Cottonwood Creek and impacts to this creek. A commitment will be required of Beaver Creek Coal Company to provide a detailed geomorphic study and riparian study of the channel and implement the necessary protection for the channel in the event that substantial groundwater discharges become a reality prior to permit approval.

R614-301-727

This has not been adequately addressed. The availability of water shares in Joe's Valley Reservoir must be verified prior to permit approval.

R614-301-728

The operator has addressed groundwater occurrence in the permit area to the best of his ability and, therefore, the Division feels that a finding of no significant impact to the hydrologic balance can be made.

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