

United States
Department of
Agriculture

Forest
Service

Manti-La Sal
National Forest

599 West Price River Dr.
Price, Utah 84501
(801) 637-2811

ACT/015/009#2
RECEIVED
OCT 19 1995
DIVISION OF OIL, GAS & MINING

File Code: 2820-4

Date: October

Utah Division of Oil, Gas and Mining
ATTN: Pam Grubaugh-Littig
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

Re: Updated Plan for Trail Mountain Mine (Permit Renewal), Trail Mountain Mine, PacifiCorp, ACT/015/019, Folder #2, Emery County, Utah
001

Dear Pam,

Copy from Dawson

My staff has reviewed the Permit Application for PacifiCorp's Trail Mountain Mine. The following are our comments:

Page 2-2, Section 2.2.2. The list of surface owners is not complete. Section 6, T 17 S, R 7 E, containing a portion of the lease, is BLM land.

Page 2-3, Section 2.2.6. The phone number for the Resident Agent is not correct.

Page 3-34, Section 3.4.2.1, third paragraph. The Forest Service has not proposed any road development in lower Cottonwood Canyon.

Page 3-36, Section 3.4.3.1, first paragraph. The statement "Due to the limited recharge to the Blackhawk Formation, mining within the Trail Mountain Permit Area will have negligible impact on the regional hydrologic balance" seems to contradict itself. Limited recharge would make any impacts to the hydrology more significant and long-lasting. PacifiCorp must quantify the expected impacts to any aquifer and the hydrologic system.

Page 3-50, Section 3.4.8.2, third paragraph. The term "to the extent technologically and economically feasible" must be removed. Forest Service Special Stipulations require mitigation of subsidence impacts. There is no limitation based on economics.

Page 3-50, Section 3.4.8.2, fourth paragraph. The term "prior to final bond release" must be removed. Forest Service Special Coal Lease Stipulations require replacement of water lost or affected by mining operations at least until lease relinquishment.

Page 3-67, Figure 3-9. To protect wildlife from injury, the hog wire on the fence must be not over 30 inches high, not 36 inches as shown. The distance between the top of the hog wire and the single strand of barbed wire must be not less than 12 inches.

Page 4-3, Section 4.3.2.2. Lease U-64375 is not mentioned. It is the largest coal lease on Trail Mountain.

Page 4-6, Section 4.4.2.1. At the time John Niebergall (1981) made the statement that National Forest System lands within the mine plan area are unsuitable for range, the mine plan area was much smaller. Much of lease U-64375, which was issued in 1990, is used as rangeland for both domestic livestock and wildlife.

Page 4-9, Section 4.4.3.2. By accepting the lease with its stipulations, PacifiCorp committed to replace water in quality and quantity. Guzzlers may be an appropriate mitigation measure in some situations, but usually would not replace water in quality and quantity. The paragraph must be changed to state that water will be replaced in quality and quantity with a method acceptable to the surface management agency.

Page 7-14, Section 7.1.5. The gradual increase in groundwater entering the mine could decrease the groundwater contribution to Straight Canyon. The water would be discharged to Cottonwood Creek. PacifiCorp must quantify the changes in flow and describe potential impacts to Straight Canyon and Cottonwood Creek.

Page 7-15, Section 7.1.6, second paragraph. The term "to the extent technologically and economically feasible" must be removed. PacifiCorp committed to mitigating damages when they accepted the leases with their Forest Service Special Stipulations. There is no exception based on economics.

Page 11-5, Section 11.9. Delete the phrase "to the extent technologically and economically feasible", as discussed above.

Plate 7-1. This map must be updated. PacifiCorp knows of numerous springs, some of which they monitor, that are not shown on this map.

We will withhold our consent on the Permit Renewal until these items are addressed. Please contact Carter Reed or Dale Harber at (801) 637-2817 if you have any questions.

Sincerely,



for
JANETTE S. KAISER
Forest Supervisor

APPLICATION FOR PERMIT CHANGE

Title of Change:

RESPONSE TO DIVISION ORDER #95A

Permit Number: *ACT10151009*

Mine: *TRAIL MOUNTAIN*

Permittee: *PACIFIC CORP*

Description, include reason for change and timing required to implement:

INFORMATION TO ADDRESS RESOURCE CONSERVATION (COAL), SUBSIDENCE AND PHC AS REQUIRED BY DO #95A.

- | | | |
|---|--|--|
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 1. Change in the size of the Permit Area? _____ acres <input type="checkbox"/> increase <input type="checkbox"/> decrease. |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 2. Change in the size of the Disturbed Area? _____ acres <input type="checkbox"/> increase <input type="checkbox"/> decrease. |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 3. Will permit change include operations outside the Cumulative Hydrologic Impact Area? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 4. Will permit change include operations in hydrologic basins other than currently approved? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 5. Does permit change result from cancellation, reduction or increase of insurance or reclamation bond? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 6. Does permit change require or include public notice publication? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 7. Permit change as a result of a Violation? Violation # _____ |
| <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | 8. Permit change as a result of a Division Order? D.O.# <i>95A</i> |
| <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | 9. Permit change as a result of other laws or regulations? Explain: <i>BLM R2P2 PROCESS</i> |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 10. Does permit change require or include ownership, control, right-of-entry, or compliance information? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 11. Does the permit change affect the surface landowner or change the post mining land use? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 12. Does permit change require or include collection and reporting of any baseline information? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 13. Could the permit change have any effect on wildlife or vegetation outside the current disturbed area? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 14. Does permit change require or include soil removal, storage or placement? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 15. Does permit change require or include vegetation monitoring, removal or revegetation activities? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 16. Does permit change require or include construction, modification, or removal of surface facilities? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 17. Does permit change require or include water monitoring, sediment or drainage control measures? |
| <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | 18. Does permit change require or include certified designs, maps, or calculations? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 19. Does permit change require or include underground design or mine sequence and timing? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 20. Does permit change require or include subsidence control or monitoring? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 21. Have reclamation costs for bonding been provided or revised for any change in the reclamation plan? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 22. Is permit change within 100 feet of a public road or perennial stream or 500 feet of an occupied dwelling? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 23. Is this permit change coal exploration activity <input type="checkbox"/> inside <input type="checkbox"/> outside of the permit area? |

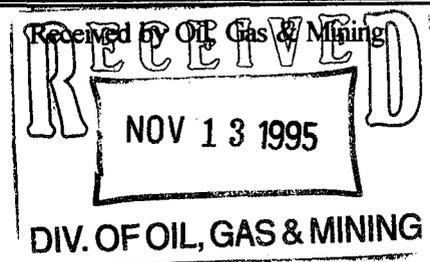
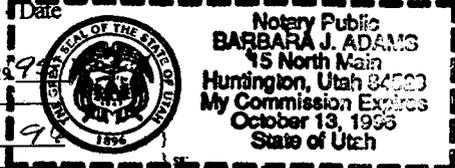
Attach *3/14* complete copies of proposed permit change as it would be incorporated into the Mining and Reclamation Plan.

I hereby certify that I am a responsible official of the applicant and that the information contained in this application is true and correct to the best of my information and belief in all respects with the laws of Utah in reference to commitments, undertakings, and obligations, herein.

Val E Payne, VALE PAYNE SR. ENV. ENGINEER *11/13/95*
Signed - Name - Position Date

Subscribed and sworn to before me this *9th* day of *Nov.*, 19*95*
Barbara J. Adams
Notary Public

My Commission Expires: *10-13*, 19*95*
Attest: STATE OF *Utah*
COUNTY OF *Emery*



ASSIGNED PERMIT CHANGE NUMBER

