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United States Department of the Interior
OFFICE OF SURFACE MINING
Reclamation and Enforcement
BROOKS TOWERS
1020 15TH STREET
DENVER, COLORADO 80202

orig - mine file
cc - J. Smith
file

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DIVISION OF OIL
GAS & MINING

ACT/015/018
#2

Dr. Dianne Nielson
Division of Oil, Gas, and Mining
4241 State Office Building
Salt Lake City, UT 84114

Dear Dr. Nielson:

Enclosed are the U.S. Forest Service comments concerning the Deer Creek Mine permit application package. The Office of Surface Mining, Western Technical Center is preparing a written response to the issues which the Forest Service has raised. A copy of the response letter will be forwarded to you in the standard distribution process.

If you have any questions, please call Louis Hamm or Walter Swain at (303) 844-3806.

Sincerely,

Walter Swain

for
Stephen F. Manger
Utah Task Force Leader

cc: Mary Boucek, DOGM



Reply to: 2820

Date: August 22, 1984

Allen D. Klein, Administrator
OSM - Reclamation and Enforcement
Brooks Towers - 1020 15th Street
Denver, Colorado 80202

Dear Mr. Klein:

The Forest received a copy of the Deer Creek Mining and Reclamation Plan (MRP) December 29, 1983. We have not yet received the draft Technical Analysis (TA), consequently, our comments only encompass the 1983 MRP and revisions to date.

To continue our cooperative efforts to meet your difficult time schedule, I will consent for the Forest Service to the Deer Creek MRP. My consent is subject to our receipt and review of the TA, and of satisfactory responses to our comments on both documents.

1. Several deficiencies have been noted on Map 2-18 which specifies various land uses. The map needs to be updated to include live-stock grazing, raptor nests, raptor nesting habitat, deer and elk summer/winter ranges, and commercial timber.
2. Burying any waste, toxic or natural, is prohibited on National Forest System lands.
3. Section XVII in the appendices deals with structures that could be affected by subsidence. The following items need to be included: fences, roads, stockponds and associated earth dams and water troughs.
4. A map is needed which shows the ground location of the permanent monuments used in the 1980 aerial survey. Along with this, we need a copy of the 1980 baseline and each succeeding year photography; and the horizontal vertical control of the monuments used in the baseline aerial survey.
5. This plan only addresses the impacts associated with development of the Deer Creek Mine. The Wilberg and Deer Creek Mines are superimposed and the cumulative affects of subsidence need to be discussed.



6. It is implied that the Forest Service is using photogrammetric methods for subsidence monitoring. The Forest Service has not flown this permit area as Utah Power and Light elected to conduct their own aerial photography program.
7. Utah Power and Light will have to monitor seeps and springs at least through the life-of-mine.
8. There is no commitment by Utah Power and Light to protect or replace surface water lost as a result of mining related activities. This commitment by Utah Power and Light is needed.
9. There is no commitment by Utah Power and Light to protect the escarpment. The lessee in his mining plan shall provide specific measures for the protection of the escarpment. the OSM, in consultation with and concurrence of the Bureau of Land Management and the Forest Service, shall approve such measures.
10. Two special-use permits issued to Utah Power and Light need to be included: the 345KV line up Meetinghouse Canyon, and the warehouse-storage yard on SL-064607.
11. Utah Power and Light has not shown there is material available to adequately topsoil during reclamation. Topsoil needs to be spread over the disturbed areas. Utah Power and Light will be held responsible until reclamation is adequate.
12. There is no specific mention in the Mining and Reclamation Plan that support facility structures, equipment, and similar developments will be removed from the lease area within two (2) years after the final termination of use of such facilities.
13. Land outside the lease areas but under the jurisdiction of the Forest Service needs to be excluded from the permit area.
14. The Forest Service will need to prepare environmental assessments for surface disturbing activities such as the proposed breakout in Meetinghouse Canyon.
15. The high pH furnace slag like that used in the parking lot should be experimently tested under similar reclamation conditions prior to reclamation. Its feasibility has not been determined at this time.
16. The final reclamation proposes collecting Deer Creek in a constructed channel with a capacity for the 100 year recurrence interval flow. This constructed channel traverses a hillside before the water is dumped back into the natural channel. Portions of the plan have two phases. The first phase incorporates a temporary interval flood. The second phase is to be delayed until a portion of the disturbed area is rehabilitated.

The location of the final channel should follow the topographic low, which is the natural channel. Any other design will eventually fail and the stream will then follow and likely create a new topographic low. The design should deal with the problems associated with this low location.

Sincerely,



REED C. CHRISTENSEN
Forest Supervisor