



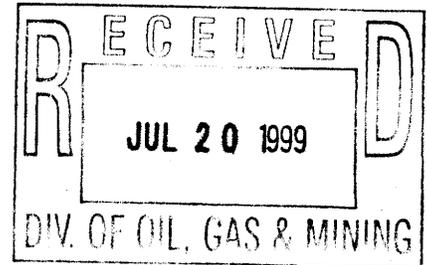
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Date: July 15, 1999

Ms. Sally Wisely  
Utah State Director  
Bureau of Land Management  
Utah State Office  
P. O. Box 45155  
Salt Lake City, Utah 84145-0155

*Copy May Ann,  
Daron, Jeff, Ann*



*ACT/015/018 #2*

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Dear Sally:

The Manti-La Sal National Forest has reviewed PacifiCorp's proposed Phase III Lease Relinquishment Application in cooperation with the Price Field Office of BLM. This Phase III application was reviewed in accordance with the Memorandum of Understanding (MOU) among USDI, Bureau of Land Management, Utah; USDA Forest Service, Intermountain Region; State of Utah - Division of Oil, Gas and Mining concerning: PROCESSING OF REQUESTS TO RELINQUISH FEDERAL COAL LEASES (10-MOU-97-001), effective October 22, 1996. PacifiCorp's Phase III Lease Relinquishment application was submitted to BLM on April 30, 1997. The Manti-La Sal National Forest has determined that there is not sufficient data included in the application for the Forest Service to make a recommendation (MOU, Section IV., Item 4, page 3). General and lease specific comments on the Relinquishment Application are as follows:

General Comments

1. PacifiCorp needs to provide required information on materials and equipment left underground in mine workings.
2. PacifiCorp provided data summary statements for each lease, or portion thereof, regarding the mining which occurred, subsidence, hydrology, vegetation, wildlife, and land uses. References are made to the annual subsidence and hydrologic monitoring reports regarding the majority of information to substantiate the summary. Since lease stipulations require a final report of the effects, the lease relinquishment requests must be stand-alone documents with specific information presented as the basis for any conclusions. It is appropriate to reference the monitoring reports but specific information regarding the subsidence profiles and spring/stream monitoring from the annual monitoring reports must be carried forward in the relinquishment request. The final revised Phase I and II Relinquishment Request Report is a good example of the necessary documentation.
3. Since the application is being reviewed in accordance with the MOU, it should specifically address whether or not the amount of subsidence detected to date is consistent with that which is reasonably anticipated and whether or not less than one foot of cumulative subsidence has occurred over the last three years. The subsidence profiles from the annual subsidence monitoring reports should be plotted on the 1996 Subsidence Map with a reference to an appropriate profile figure number. Profiles with a figure number must be provided as discussed in Item 2 above.



4. The subsidence monitoring summary and referenced subsidence information for the profiles in the proposed relinquishment areas are somewhat inconsistent and confusing. The figures show discrepancies from one year to the next regarding the amount of subsidence which has occurred. An explanation regarding why this has occurred and how the data presented in the profiles was compiled to generate the 1996 Subsidence Map is needed.
5. The ground water section is incomplete. Information is missing for some springs being monitored within the requested lease relinquishment areas.
6. The vegetation section is not complete. The summary states that aerial photographs are taken/reviewed at five year intervals and that annual inspections were conducted. There is no documentation presented to substantiate this. At a minimum, the vegetation maps from the Mining and Reclamation Plan, pre-mining baseline aerial photographs, and most recent post-mining/post-subsidence photographs should be included for visual comparison. In addition, any vegetation monitoring documents should be included. The Phase I and II documentation can be used as an example for aerial photo comparisons. The photographs presented in the Phase III lease relinquishment application are not labelled regarding date and scale and there is only one photograph for each lease area.

#### U-084923

The subsidence profiles (Figures 62 and 63) could indicate that subsidence has stabilized since the amount of cumulative subsidence shown for 1996 is less than for 1994 and 1995, but this would require additional interpretation and discussion. An explanation regarding the limitations of the photogrammetric monitoring method and reasons why the data is not completely consistent from year to year is needed.

None of the springs in this lease are addressed in the East Mountain Springs Mining History Section. Graphs showing flow and precipitation relative to time need to be included for each spring which has been monitored in and adjacent to the proposed relinquishment area need to be included. Any data gaps and anomalies between flow and precipitation need explanation.

The requested lease relinquishment area contains the mine workings which encountered the Roans Canyon Fault and Straight Canyon Syncline which might have affected flow at the Cottonwood Canyon Spring and Cottonwood Creek. No information regarding this spring and stream flow is presented. As discussed in our May 17, 1999 letter to Utah Division of Oil, Gas and Mining, this area should remain under lease until the Cottonwood Spring/Creek issue is resolved.

#### U-084924

No mining has occurred in this area and PacifiCorp has included sufficient information to document that no subsidence has occurred in this area from mining in other areas.

Information from monitoring of any springs and surface water sources in and adjacent to the requested relinquishment area must be included with a conclusion as to whether or not they have been affected by mining which occurred to the east on U-084923.

See general comment #6.

SL-070645/U-02292

The data presented on the subsidence profile graphs does not agree with the conclusions. Figure 69 indicates that there was nearly four feet of subsidence between 1995 and 1996. The monitoring data since 1996 needs to be considered and analyzed and may show different results. Figure 17 in the annual subsidence report is not readable due to the similarities in color and line width for several different years. The graph needs to be revised and included in the lease relinquishment request for review. The subsidence criteria in the MOU need to be addressed.

Graphs for some springs discussed in the data summary section are missing from the East Mountain Springs (Groundwater Quantity) section.

See general comment #6.

U-040151

Figure 17 in the annual subsidence report is not readable due to the similarities in color and line width for several different years. This graph needs to be revised and included in the lease relinquishment request for review. Figure 21 indicates that at least one foot of subsidence may have occurred between 1994 and 1996. The 1998 annual subsidence monitoring report shows that an additional foot of subsidence might have occurred between 1996 and 1997. Figure 22 shows similar results. Additional analysis/monitoring is needed for this area.

The flow graphs show that Springs 79-23 and 79-24 are not recovering from the 1989 and 1990 low precipitation years. This appears anomalous as compared to other springs in the area which show recovery from 1990 to 1995. Additional monitoring, analysis, and explanation is needed to determine the cause.

See general comment #6.

U-083066

Figure 17 in the annual subsidence report is not readable due to the similarities in color and line width for several different years. This graph needs to be revised and included in the lease relinquishment request for review.

See general comment #6.

U-1358

See comments for U-040151 regarding Figure 22. The requested relinquishment area in this lease lies at the east end of the subsidence profile where less subsidence has occurred than is shown farther to the west on U-040151. Even though it appears to have less change between 1994 to 1998, the comments for U-040151 pertain to this area because the same longwall panels are involved.

See general comment #6.

If you have any questions or need additional information, contact Aaron Howe or Carter Reed at the Forest Supervisor's Office in Price, Utah.

Sincerely,



for

DONALD G. FULLMER

cc:

D-2/3

Lowell Braxton, UDOGM, SLC

Dick Manus, BLM Price Field Office