



United States
Department of
Agriculture

Forest
Service

Manti-La Sal
National Forest

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File Code: 2820-4

Date: June 20, 2002

Mary Ann Wright
Associate Director, Mining
Division of Oil, Gas & Mining
1594 West Temple, Suite 1210
Salt Lake City, UT 84114-5801

RECEIVED

JUN 24 2002

DIVISION OF
OIL, GAS AND MINING

*Incoming
6/15/02
Copy Aaron*

Dear Ms. Wright:

The review of the April 2002 version of the Mine Plan for the Mill Fork Lease, ML-48258 has been completed.

Enclosed are the comments that need to be addressed.

If you have any questions, please feel free to contact either Karl Boyer or Carter Reed at the above address and telephone number.

Sincerely,

for Elaine J. Zieroth
ELAINE J. ZIEROTH
Forest Supervisor

Enclosure

cc:
D-2/3



Mill Fork Tract MRP Comments
Manti-La Sal National Forest
June 7, 2002

1) Biology Section, Baseline Data

The MRP needs to display data on the estimated numbers of deer and elk and the trend, up or down, of each herd so that future comparisons can be made.

2) Land Use and Air Quality Section

The last sentence of the second paragraph on page 4-3 states that the Municipal Water Supply will not be affected by underground mining activities. Provide similar statements for the other Forest Management Units discussed in this section.

3) Land Use and Air Quality Section

The Forest Service comment provided previously (February 2002) pertaining to the paleontological survey has not been addressed. Provide some detail in the narrative to describe the methodology used, area covered, number of acres surveyed, any specimens found in the area previously, and any other pertinent information. Provide a discussion for the paleo survey that is similar in scope to the that which was provided for the cultural survey.

4) Engineering Section, Subsidence Control Plan

The Forest Service concerns regarding subsidence along the power line located in the southwest portion of the lease have not been addressed. The MRP submitted in October 2001 stated that the power line would not be undermined. The revised MRP (submitted in April 2002) states that the power line is owned and operated by Utah Power, a subsidiary of PacifiCorp. As the mine plans are drawn now, they show that the power transmission line is within the subsidence zone of the two southernmost panels in the Hiawatha Seam. The Forest Service has an obligation to protect permitted improvements on National Forest System Lands unless/until the Permit Holder notifies us, in writing, that alternative arrangements have been made. Any alternative arrangements must address the stability of towers /poles and servicibility of line through any duration of forecast subsidence period(s), and be acceptable to the Manti-La Sal National Forest prior to incorporation into the MRP. As stated in our February comments the subsidence protection method for the power line must be discussed in detail (angle of draw, geologic structural features in the area that could affect subsidence). Also, as stated in our February comments, make sure the mine plans agree with the narrative.

5) Engineering Section, Subsidence Control Plan

With regard to the discussion on page 5-22 pertaining to the Merit Oil Company gas production well, the MRP must state that the lessee/operator will commit to coordinating mining activities with Merit Oil Company to assure that protection measures are adequate.

6) Engineering Section, Subsidence Control Plan, page 5-23

As pointed out our February 2002 comments, prior to the Mill Fork MRP being approved, PacifiCorp must state that they have coordinated with Emery Water Conservancy District regarding their plans to undermine the flow monitor and solar powered telemetry transmitter in T16S, R6E, Sec 23 and that PacifiCorp agrees to repair any and all damages to the flow monitor at PacifiCorp's own expense. If some other arrangement has been reached, then provide a detailed explanation of the agreement in the MRP. PacifiCorp must provide a letter to the Manti-La Sal National Forest from the Emery Water Conservancy District stating that the water users are satisfied with the arrangement as described in the Mill Fork MRP.

7) Engineering Section, Reclamation Plan

As stated in our February comments, the Reclamation Plan must state that all underground equipment will be removed unless specific approval to abandon such equipment has been granted by the appropriate regulatory authorities. The last subsection in the April 2002 MRP revision under the Reclamation Plan heading is titled Surface Coal Mining and Reclamation Activities. Our comment pertains to underground mining reclamation. Include a subsection that specifically addresses this point.

8) Engineering Section, Reclamation Plan, Corner Monuments

State Coal Lease ML 48258 Special Stipulation #16 states that the lessee will replace all damaged, disturbed or displaced corner monuments, their accessories and appendages. This needs to be carried into the MRP.

9) Engineering Section

Either the Subsidence Control Plan or the Reclamation Plan of the MRP must state that Forest Road 50244 and any other developments in the Mill Fork Tract will be inspected annually for damage and that any damages will be repaired at the expense of the lessee. With regard to FR50244, the minimum requirement will be an annual inspection to check for tension cracks and buckling, followed by restoration of the road surface as necessary. The statement on page 5-33 of the Subsidence Control Plan only addresses part of our comment made in February, i.e., that any damages will be repaired at the expense of the lessee, but does not address the Forest Service concerns about monitoring subsidence effects upon roads and structures. The narrative must discuss a monitoring plan for these features.