

### Document Information Form

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STATEMENT

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Ron

Let's look into this matter  
If Crawford had been more  
factual & less governmentally oriented  
I would feel better

Wilberg Peabody Coal  
015-006



CIRCULATE TO:

DIRECTOR \_\_\_\_\_

PETROLEUM ENGINEER \_\_\_\_\_

MINE COORDINATOR \_\_\_\_\_

ADMINISTRATIVE ASSISTANT \_\_\_\_\_

ALL \_\_\_\_\_

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FOR FILE

Statement by Clay E. Crawford, a private landowner in Emery County regarding the Emery EIS dated August 6, 1976, at the public hearing in the Provo City Chambers, 359 West Center, on September 9, 1976.

My name is Clay E. Crawford, and I reside at 9255 SW Arrowwood Drive, Beaverton, Oregon. Presently, I manage my own consulting service on matters relating to fish and wildlife conservation. Prior to this venture, I was employed by the U. S. Fish and Wildlife Service for 28 years and held both field and administrative positions in the Service's two western regions which encompassed the 16 western states, including Alaska and Hawaii. Among my many assignments prior to my retirement from the Service, I participated in formulating plans for monitoring environmental damage along the Alaska pipeline, and I was the Service's western representative assigned to work with the then Atomic Energy Commission during its experiments on the island of Amchitka, a National Wildlife Refuge in the Aleutian Chain. As further background, I am proud to say that I am the third generation of Crawfords from Castle Dale and spent my first 18 years in Castle Valley assisting my parents in their livestock operations, there, in Sinbad, and on East Mountain.

Tonight, I am here in a dual capacity -- to represent the Crawford Family interests within the boundaries of the Wilberg coal lease, and to comment on the irreversible damage to Castle Valley, and especially East Mountain, if this permit is approved. Our major concern is the Environmental Impact Statement's prediction of the total loss of 4,658 acres of land and the annual loss of 180 acre-feet of surface water. Contained in each Chapter of the EIS is a sub-part entitled, "Geology and Topography". The wording in each Chapter under this sub-part is almost identical: "Subsidence of from 1 to 5 feet on 3,858 acres and from 1 to 10 feet on an additional 800 acres above the Wilberg Mine could occur and would represent an irreversible change to geologic formations on 4,658 acres". SUBSIDENCE is described as the formation of vertical cracks which when reaching the surface could be 3 feet wide. In addition to these common cracks, sink holes and compression bulges occur on the surface. The crowning blow is the statement that there is no practical means by which the subsidence could be mitigated, and, there are no laws, precedent decisions, nor commitment by or from Federal, State, or local entities, nor by the Company, to mitigate adverse impacts on agriculture, livestock production, recreation, or summer home sites. With this background, it leaves little question that private industry and perhaps even the Federal government will sacrifice the surface acres on both the Wilberg and Deer Creek leases. Blackstone said that "good laws make it easier to do right and harder to do wrong." It appears to me that in this instance we can't even do wrong right!

I developed a high regard for the U. S. Forest Service and the Bureau of Land Management during my 28 years of Federal service, and I believe there must be considerable confusion in the ranks of these two agencies -- they are charged with the responsibility of managing a valuable surface resource while their sister agencies may be recommending permits which could result in total destruction of the same resource.

The entire Emery report leaves me with a very real apprehension that the great technological machine is running full speed and out of control, and that our system

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of managing our natural resources is fast approaching environmental chaos -- and this is only the beginning! There is only enough coal in the Wilberg lease to keep the Emery project going for 17 years. No commitment is made for the source of the additional 44 million tons required to operate the generators for the remaining 18 years. Are we prepared to risk total destruction of our natural resources forever in this area for 17 years of prosperity -- the interests of a few people as opposed to those of future generations? If this project is approved, then both government and industry should make a commitment, here and now, that the Blind Canyon and Hiawatha seams would never be mined on the same leases. Already there is an 800-acre overlap, and the report leaves no doubt that this area would be unsafe for human occupancy. And what is even more alarming is that no one can identify the location of this 800-acre parcel!

Title 43 of the Code of Federal Regulations provides for formulation of general requirements which lease applicants must meet to protect non-mineral resources during exploration or mining. We urge the Forest Service and the Department of the Interior to fully exercise their Title 43 authority in any coal leases, especially the Wilberg lease.

The Emery EIS identifies only 10 springs on the Wilberg lease. Those of us who intimately know East Mountain know there are many additional springs; consequently, further studies are needed. We are encouraged, however, that the U. S. Geological Survey has been directed by administrative order to proceed with monitoring and identifying all water sources affected by coal mining in this area. No mining should occur until all surface water and all other natural resources are accurately inventoried. Such data are an absolute necessity in the decision-making process.

The EIS is somewhat contradictory with reference to private lands within the lease. One statement says that the surface in the Wilberg lease is unoccupied Forest Service land while another states that a private landowner proposes a summer home development. We, the Crawford Family, also have given some consideration to development, but now that we are faced with the eventual loss of surface water and with significant surface changes, it is impractical to plan for future uses. I believe it would be proper and important to add a land-status map to the report.

Public pressure and demand for quality hunting is mounting each day. Any loss of deer and elk habitat that cannot be restored at this point in time is extremely critical, and we will be held accountable to both present and future generations of sportsmen.

Many people have had the opportunity to stand at Burnt Tree Spring and look south into Sinbad. The esthetics are breathtaking, and on a clear day Window Blind Peak and even the Henry Mountains are visible. These esthetic resources are of a very high quality, and it grieves us to think this quality will be substantially and permanently damaged by smoke stacks and conveyors, to say nothing of the resulting smog in the valley.

In attempting to envision what East Mountain and Castle Valley might look like in 35 years from now is utterly frightening. If industry continues to destroy surface values with underground mining activity, continues to pour sulfur dioxide into the air, and continues to pollute our water, then the size of the declared quarterly dividend to a few stockholders will be small satisfaction to the inhabitants of that area.

In conclusion, I would like to say that I am not opposed to the orderly development and management of our natural resources. The 70's were to be the years when America pays its debt to the past by reclaiming its air and its water, and safeguarding its living environment. What has happened? An energy crisis has delayed the 70's goals for years -- if not forever. Industry and government must find new and better ways to do business. Science does not exaggerate the hazards of irreversible damage to the environment.

I am sure that neither industry nor government wants to leave a biological desert on East Mountain as a monument to future generations that despite the 200 years of experience and progress our forefathers gave us, we made a grave mistake. Lets try to slow down the "steamroller" to a pace which will permit all the people to benefit from the harvest of our natural resources with a very minimum of irreversible damage.