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STATE OF UTAH
NATURAL RESOURCES
Oil, Gas & Mining

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November 27, 1984

Office of Surface Mining
Western Technical Center
Brooks Towers
1020 Fifteenth Street
Denver, Colorado 80202

Attention: Mr. Bill Kovacic

Ladies and Gentlemen:

RE: Additional Documentation, Utah Power & Light Company, Wilberg Mine, ACT/015/019, #2, Emery County, Utah

As was discussed during a November 2, 1984 meeting between technical representatives of the Division and the Office of Surface Mining (OSM), the Division should request further justification or documentation regarding several technical issues analyzed during the recently concluded review process for the Wilberg Mine. It was understood at the conclusion of the meeting that the OSM would provide this additional documentation to the Division upon written request from the Division. Therefore, the Division requests additional technical analysis information in the following three areas:

1. Barrier Pillar Design (UMC 817.126)

Buffer zones designed to restrict subsidence by utilizing room and pillar mining methods with the retention of pillars under Cottonwood Creek were proposed and approved. Approval for mining beneath and adjacent to Cottonwood Creek requires a determination, based on detailed subsurface information, that subsidence will not cause material damage which could result in environmental degradation to the stream. It is not clear, based on barrier pillar design information in the Wilberg Mining and Reclamation Plan (MRP) or on the analysis of this information in the Technical Analysis (TA), what, if any, the extent of mining induced subsidence will be and

whether Cottonwood Creek will sustain material damage. Further information regarding pillar strenth and safety factor values, angle of draw calculations, calculations utilized to derive pillar dimensions, anticipated rate of pillar collapse, etc., is requested.

2. Mining Under Steep Slopes (UMC 817.121)

Information given in the MRP indicates that the Castlegate Sandstone does not overlie projected workings along the southern margin of the Wilberg Mine. This area is characterized by moderate to steep slopes and highly variable overburden thicknesses. These factors suggest that, in this area, unplanned subsidence is more likely to occur and, therefore, the surface is at high risk to experience material damage. Additional data and/or justification are requested to support the determination that the permittee is in compliance with UMC 817.121(a) and UMC 817.97(a).

3. Cottonwood Portal Drain (UMC 817.41, 817.50)

Data have not been provided in the Wilberg MRP to assess whether the capacity of the Cottonwood Portal drain will be adequate to prevent mine flooding and associated build-up of hydraulic head and unplanned discharges as required by UMC 817.41 and 817.50. The MRP does not address the impacts of continuous discharge from the Cottonwood Portal into Cottonwood Creek. The additional discharge from Cottonwood Portal may increase stream flow by up to 50 percent and, therefore, requires regulatory authority evaluation of UMC 817.50(b). Additional information is requested regarding the technical analysis of UMC 817.41 and 817.50 as indicated above, which includes an analysis of the potential for discharge and subsequent potential impacts to the creek.

During the November 2 meeting, two issues regarding wildlife were also discussed. It was concluded during the meeting that the OSM would request UP&L to revise the Wilberg MRP and, therefore, adequately address these concerns. The two issues are:

Prior to federal or state permit approval, the Division of Wildlife Resources (DWR) requested additional information on mitigation regarding the 16-acre waste rock disposal area located in high priority mule deer winter range, as per UMC 817.97. This comment was addressed by UP&L (May 3, 1984, page 5, Appendix VII, Wilberg MRP) in the following manner: "Applicant will consult with the DWR to prepare a reasonable wildlife mitigation plan." Neither the Division nor DWR regard this response as adequate in that there is no time frame associated with the intent to consult with DWR in preparation of an appropriate mitigation plan. Immediate development of the mitigation plan will accommodate present and future impacts to the high priority winter range. Therefore, at a minimum, the mine plan must contain an adequate time frame for development of this mitigation plan in consultation with DWR.

The permittee must provide a commitment to mitigate potential damage to critically valued raptor nesting habitat that may be impacted by subsidence, as required by UMC 817.97(d)(4).

In addition to the aforementioned concerns brought out during the November 2 meeting, the future of mining under the Left Fork of Grimes Wash was discussed. The Division recognizes that the permittee may not legally mine under this perennial stream during the current permit term and that the approved mining sequence may not be changed prior to regulatory authority (OSM, DOGM) approval. However, the Division is of the opinion that these points must somehow be stressed within the context of the recent permit approval, particularly the point that the future of mining under Grimes Wash, during subsequent permit terms, is dependent upon the results of on-going subsidence survey studies. The OSM's affirmation of this would additionally support analyses conducted and subsequent decisions made during the course of permit approval.

The Division is most appreciative of the opportunity to meet and discuss these subjects at length with the OSM and its Contractors. Similar concerns pertaining to the Deer Creek MRP and review process which were brought to light during the meeting will be summarized in a separate document. Thank you for your attention to these matters.

Should you or your staff have any questions, please contact the Division at your earliest possible convenience.

Best regards,

Dianne

Dianne R. Nielson
Director

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