



State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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February 12, 1998

To: File

Thru: Joe Helfrich, Permit Supervisor 

From: Wm. J. Malencik, Reclamation Specialist 

RE: Bond Release, Permit Boundary Change, PacifiCorp, Cottonwood Mine, ACT/015/019-98A, Folder #2, Emery County, Utah

Summary

The Geology review on the referenced amendment is included herein. Recommend the amendment be approved with the exception of two small areas of concern voiced by the Forest Service. The small areas of USFS federal land lie in the northeasterly and northwesterly portion of the applied lands. The Forest Service advised me they would provide the legal description of areas of concern by aliquot parts of a section.

Scope of Review.

This recommendation is solely based on a record review of information provided by the permittee and other agencies. The record shows that at least four problem solving meetings have been held in the field. DOGM officials from headquarters, I have been advised, attended these meetings. Their field reports may provide additional facts concerning the Division's position from a field perspective on both of the areas noted above.

Geology

Analysis:

The only geological issue concerns subsidence. The area was mined in about 1989; therefore, the areas have stabilized, according to the repetitive annual subsidence reports. The only question remains, what action is needed, if any, to minimize the adverse effects of subsidence on the two small areas?



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Findings:

The USFS has concerns on two small areas according to past records and current discussions. As the surface management agency, they must be comfortable that the lands are restored for suitable post-mining multiple uses. The USFS, through policies and brochures, invites the public to enjoy and use forest service lands. Further, livestock permittee's pay for the privilege of grazing livestock on USFS lands. Therefore, such lands by necessity must be reclaimed and safe from hazards.

Under the circumstances, it appears two options are open to the Division:

- (1) Have PacifiCorp perform the required reclamation/safety work, or
- (2) Approve the permit amendment, deleting the aliquot parts that the USFS believes requires further field work and/or evaluation.

Interagency Considerations on the Current Process

Perhaps the linkage between DOGM permit termination process and lease relinquishment because of recent developments may need additional discussion among DOGM, BLM, and USFS Management. BLM relinquished a portion of the applied lands, about 1300 acres in 1992, even though DOGM permit boundary, to date, remains unchanged.

There are some common threads that run through both a DOGM permit change and a lease relinquishment on affected areas. It seems that lease relinquishment and DOGM mine permit termination could be discussed to provide better linkage, avoid duplicating work over an extended period of time, and handle things as a package approach to the maximum extent possible.

sd
cc: Jesse Kelley, Team Leader