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United States
Department of
Agriculture

Forest
Service

Manti-La Sal
National Forest

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File Code: 2820-4

Date: March 20, 2001

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The Manti-La Sal National Forest has completed our review of the Wild Horse Ridge Amendment to the Bear Canyon Mine MRP. We cannot consent to the amendment until the enclosed comments applicable to National Forest system lands are addressed. The comments applicable to non-National Forest System lands are included as recommendations.

Please contact Dale Harber at (435) 636-3548 if you have any questions.

Sincerely,

for copied to Daron
Paul

[Handwritten signature]
ELAINE J. ZIEROTH
Forest Supervisor

Enclosure



Forest Service Comments on the Wild Horse Ridge Amendment to the
Bear Canyon Mine MRP

The following comments apply to National Forest System lands, which must be addressed before the Forest Service can consent to the MRP amendment:

Page 1-8, first paragraph.

Describe the potential impacts of mining on the hydrologic system. Mining is planned to preclude impacts, but there should still be a description of the potential impacts. Explain how water would be replaced at its source.

Page 5-4, last paragraph.

The cultural resource reports submitted with this amendment, and in the MRP, do not support the statement that a survey was conducted for those areas that may be adversely impacted by subsidence. The only record that cultural resource surveys have been done on National Forest System lands on Wild Horse Ridge that are mapped as "potential subsidence zones" on Plate 3-3 is two drill sites surveyed by Kenneth Juell (1982). As a minimum, a literature and map search must be completed, and a summary provided, assessing the area for both historic and prehistoric resources that could be impacted.

General hydrology comment:

The amendment does not contain enough data to evaluate the adequacy of the proposed monitoring. The text infers there are additional data points which are not shown on the maps. We need to compare spring locations, areas to be mined, and areas and amounts of predicted subsidence to evaluate potential impacts.

PHC by Mayo and Associates, 16 August 1999, revised 9 March 2000

Page 33

Springs 16-8-18-5 and SBC-19 should be added to Plate 7N-2.

Page 34

Springs 16-7-1-6, 16-8-20-1, and SBC-18 should be added to Plate 7N-2.

Page 35

Springs 16-7-12-6, 18-8-5-1, 16-8-6-1, FBC-6A, FBC-6B, FBC-7, and FBC-8 should be added to plate 7N-2.

Page 36

Springs FBC-9 and 16-8-8-5 should be added to plate 7N-2.

Page 37

Springs FBC-11, Defa #1, and Defa #2 should be added to plate 7N-2.

Page 129

Springs 16-7-24-3 and SBC-17 must be monitored, because they discharge from a sandstone horizon directly above the Blind Canyon Seam and could be disrupted by mining. Provide an explanation of the potential impacts to these springs. Other uses of the springs must be evaluated, such as for livestock and wildlife use, in addition to discussing the disruption of flow in Bear Creek.

Page 146, 10.2 Springs

All known springs should be added to plate 7N-2, not just those to be monitored. It is impossible to evaluate the spring monitoring program until we can see the location of all springs within or near the proposed mining area.

Page 148, *Blackhawk Formation and Star Point Sandstone groundwater systems*

Spring 16-7-24-3 must be added to the list of springs to be monitored, because it could be disrupted by mining, as stated on page 129 of this document.

The following comments do not apply to National Forest System lands, but are provided as recommendations:

Page 3-62, Section 3.6.3.1, Exploratory Holes, Bore Holes, and Wells

Cementing the upper 5 feet of an abandoned drill holes is not acceptable. State and federal regulations state that the holes must be filled with cement their entire length.

Page 3-73, first paragraph.

The second sentence of this paragraph does not make sense.

Page 3-117, last paragraph.

The silt fences at the bottom of slopes should be placed a few feet out from the base of the slope. There is no description of how or when the silt fences would be maintained or removed.

Page 3-118, first paragraph.

Fill material should be placed in lifts not exceeding 12 inches. Large diameter rocks may be incorporated into embankments as long as finer material adequately fills the voids, and in lifts not exceeding 24 inches.

Page 3-119, second paragraph.

Round the top of the cut to reduce erosion if there is not enough fill material to eliminate the entire cut.

Page 3-119, last paragraph.

Do not use fertilizer. Place the seed in the ground; don't use seed that is inside the erosion control mat.

Chapter 3, Attachment A, Slope Stability Analysis, page 12.

Lifts should be limited to 12 inches, but lifts of up to 24 inches are permissible when large rocks are incorporated in the fill.

Page 4-10, Section 4.4.3.1, second paragraph.

The requirement for leaving a pillar of coal around a drill hole could definitely cause conflicts between coal production and oil and gas production.

Page 4-13, Fertilization and Neutralization.

The Forest Service has had better success in reclamation by not using fertilizer. Unless there is abundant water, fertilizer is not recommended.

Page 5-9, first paragraph.

The statement that the 1982 cultural resource report by Kenneth Juell could not be located is not accurate. A copy of the report is located immediately behind this section.

Page 7-119, second and third paragraphs, and page 7-121, first paragraph.

The calculations for storage in the sediment pond (p. 7-119) and the inlet channel (p. 7-121) seem to be based on a 10-year, 24-hour storm, but the calculations for the spillway (third paragraph) are based on a 25-year, 6-hour storm. Explain why is there a difference.

Page 7-124, Section 7.2.8.7 Belt Portal Pad Catch Basin.

These calculations are based on a 10-year, 6-hour storm, which is different from the two storm event sizes listed above. Explain why there is a difference.

Page 9-23

In the forb seedmix, replace yellow sweetclover with Ladak alfalfa. Reclamation success should be better, and probably less costly, if tubling stock were used for the shrubs rather than seed.