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United States Department of Agriculture
Forest Service
Manti-LaSal National Forest
599 West Price River Dr.
Price, Utah 84501

OSM-WTC
1985 APR -8 AM 9 41
WESTERN TECHNICAL CENTER

Reply to: 2820

Date: April 3, 1985

Mr. Al Klein, Administrator
OSM-Reclamation and Enforcement
Brooks Towers - 1020 15th Street
Denver, Colorado 80202

Dear Mr. Klein:

The Manti-LaSal National Forest received a copy of the Permit Application (PA) for the Crandall Canyon Mine Lease Tract 2 Area from the Office of Surface Mining September 27, 1984. Just prior to completing our review, we were informed that the review being done on the application could be temporarily postponed. This should give the company sufficient time to respond to our comments. The document appears to have been assembled and then sent out for review without a thorough examination of the contents. Many sections are referred to in the PA, but for one reason or another have been excluded from the PA. Facts and figures from one section of the PA do not coincide with what is found elsewhere. Many plates are either missing or mislabeled. We believe the following comments substantiate that the PA has been prepared with a minimum of effort, and needs many changes.

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Genwal Coal Company controls approximately 155 acres in Emery County Utah (see Figure 1-1); 75 acres of which is a new lease and will be referred to as Tract 2.

The designation of 155 acres and 75 acres should be changed to 161.17 and 77.53 respectively.

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Impact on nesting birds will be minimal and local. No endangered species nest in the area.

This paragraph implies no endangered bird species nest in the area, when in fact a threatened bird species does. At the time the Forest Service evaluated Genwal's Mining and Reclamation Plan in 1981, an active Golden Eagle nest site was located 0.5 miles from their proposed portal location.

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The table of contents for the overall mine plan, located at the front of this volume, lists the chapters and appendixes.

The Table of Contents is not included at the front of the PA as indicated.

TO BE FORMATTED WHEN COMPLETED VERSION OF MRP FINISHED

UNDISTURBED DRAINANGE

The undisturbed runoff diversion ditch will be located at the base of the upper substation pad highwall. This ditch will serve to cutoff water before it enters the disturbed area and transport it around the minesite. The upper pad drainage outside the substation berm will also be transported around the minesite. This runoff will not be contaminated and minimal sediment will be gained going across the pad due to the small area proposed. The area inside of the substation berm will act as it's own sediment pond and water will not be able to enter or leave this area. It is designed to handle all rainfall from a 50 year 24 hour event, snowfall will also remain inside the bermed area. This berm will also retain any oil from the transformers in the event of a rupture. If the soil inside the berm area should become contaminated, beyond normal operating levels, it will be removed and disposed of in approved landfill. Retaining the water in this area will enhance the drainage of the mine site and reduce sediment levels in the main sediment pond. All other undisturbed runoff entering the minesite will be diverted to the sediment pond, and the pond will be sized for the additional flow.

SEDIMENT POND

The sediment pond, culverts, ditches, inlets, and other control devices will be sized and submitted for approval when the attached preliminary design drawings are finalized.

OIL AND FUEL STORAGE

The oil and fuel storage area will be surrounded by a berm 2.5 feet high and the volume inside of the berm area will be of sufficient size to contain a spill if 50% of the material stored in the area were to rupture. Any soil contaminated beyond normal operating conditions will be removed and disposed of off-site in an approved landfill operation.

CONTAMINATED SOIL REMOVAL

Any soil found to be contaminated beyond resonable operating conditions during the construction or operating phase of the operation will be disposed of off-site in an approved landfill operation. Genwal Coal Company will request from the

division an approval of the landfill site prior to removing any contaminated material. Contaminated soil may be stored on site temporarily while scheduling of disposal equipment is completed. This material will be stored in a manner that will protect the environment and surface water characteristics.

SUBSTATION

The substation will be located on the pad area, this pad area has been previously disturbed. After construction of the substation is completed the access road to the pad site will be used only in the event of an emergency. No daily vehicular traffic will be allowed on the access road. This access road will be seeded upon completion of the pad construction and substation installation.

ROADS

Roads on the site will be manintained in accordance with the Forest Service Road Use Permit where applicable and with the state regulations on all other roads.

Surfacing and maintenance of the Forest Service roads will be done in accordance with the approved plans.

BUILDINGS

The existing two trailers will be moved to the new pad area. The generator will be stored on the new pad pending sale or installation as backup unit for the fan and underground equipment. A bathhouse facility may be constructed in the future and all state, local, MSHA, and Forest Service health regulations will be followed.

TOPSOIL

Topsoil will be stored at the east end of the property and protected from disturbance by construction of a fence on the pad side. Topsoil will be seeded with the approved seed mix. Straw bales will be used to prevent soil erosion while the seed is germinating and taking hold.

PARKING

The existing facilities area will be used for parking of employees as well as other users of the canyon. Parking for the convenience of other Forest users will be provided past the mine site and the road will continue onto the existing road.

COAL HANDLING

Coal being produced from the mine will be dropped over the highwall into the existing stockpile. The front end loader will then pickup the material and load it into trucks.

WATER SYSTEMS

Culinary water will be supplied to the mine from approved sources in the Huntinton town water system and carried in containers designed for culinary water.

Raw water supplied underground will come from ground water that is entering the mine. If sufficient water is not encountered a small submersible pump placed in Crandall Creek will pump water into the mine. Sumps will be maintained underground to efficiently handle the water. Water pumped from the mine will first enter the sediment pond, however no water has been pumped from the mine to date.

FILE ACT/015/032
FOLDER #7

GENWAL COAL COMPANY

P.O. Box 1201 • Huntington, Utah 84528
Telephone (801) 687-9813

April 2, 1985

RECEIVED

APR 04 1985

DIVISION OF OIL
GAS & MINING

Mr. Dave Lof
Department of Natural Resources
Division of Oil, Gas and Mining
355 W. North Temple
3 Triad Center
Suite 350
Salt Lake City, Utah 84180-1203

Dear Mr. Lof,

At this time I would like to request an extension of the time limit to abate violations 85-4-7-2 #1 of 2, 85-4-7-2 #2 of 2.

Violation No. 85-4-7-2 #1 of 2 concerning the spring and seep survey has not been completed to date. Management personnel changes and lack of coordination of consultants has led to an oversight of the problem. These personnel problems have hopefully been rectified and the study will be conducted within the very near future. We will be in contact with your office within the next couple of weeks to formulate a plan to supplement the existing information to meet your needs. The spring survey will be conducted as soon as the plan has been formulated and the weather conditions permit the necessary field work.

Violation No. 85-4-7-2 #2 of 2 concerning the access and on site roads has been delayed by the existing winter weather conditions experienced on the site within the last few months. However a limited amount of work has been done on the road to improve drainage controls. Further work will be done in the very near future, weather permitting, this work will include adding the necessary road base to bring the road up to standards, compaction, drainage, and dust control.

The necessary chemical toilet has been obtained and placed in service at the mine site. I hope this will meet the requirements to abate violation No. 85-4-5-2 #1 of 2.

Genwal Coal Company at this time would like to express their thanks for the cooperation of the Division in these matters and other related problems, we will attempt to better our relations with the Division in the future and upgrade our compliance record.

If their are any further questions or comments please feel free to contact me at 687-9813. Thank you very much for your time and consideration.

Sincerely yours,

Charles H. Gent Jr.
Vice President