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United States Department of the Interior  
OFFICE OF SURFACE MINING  
Reclamation and Enforcement  
BROOKS TOWERS  
1020 15TH STREET  
DENVER, COLORADO 80202

orig mine file  
C. L. Burston

RECEIVED

MAY 31 1985

DIVISION OF OIL  
GAS & MINING

ATT/015/032  
#2

TRANSMITTAL

OSM REFERENCE #: UT-0067

TRANSMITTED TO: Dr. Dianne Nielsen, Director  
Division of Oil Gas & Mining  
355 West North Temple, 3 Triad Center, Suite 350  
Salt Lake City, Utah 84180-1203

FROM: William J. Kovacic, Branch Chief, Mining Analysis Division  
Office of Surface Mining, Western Technical Center  
*WJK for BK*

We are forwarding herewith a copy of the Manti La Sal National Forest  
letter from the Price Office. This letter is  
for Genwall Coal Company's Crandall  
Canyon Mine in Carbon County,  
Utah.

This material is for your records. *also, a copy should accompany any comments your staff may have on the Crandall Canyon mine for the applicant.*

If you have any questions or need additional information, please contact  
Richard Hebbrock, Senior Project Manager or Ron Naten,

Project Leader at FTS-327-5656 or (303) ~~837-5656~~  
569-3806 894-3806



United States  
Department of  
Agriculture

Forest  
Service

Manti-LaSal  
National Forest

599 West Price River Dr.  
Price, Utah 84501

Reply to: 2820

Date: April 3, 1984

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

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.

Page 1-1

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.

Page 1-7

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.

Page 1-8

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.



Page 2-1

Also a portfolio of comments received to this date. (Appendix 2-1)

The portfolio of comments (Appendix 2-1) mentioned above is not included in the Appendices as indicated in the main text.

Table 2-1 starts on page 2-1 and Table 2-4 begins on page 2-11, but there are no Tables 2-2 and 2-3 in between pages 2-1 and 2-11. Do the tables need to be renumbered, or do Tables 2-2 and 2-3 need to be included?

Page 2-5

The Table of Contents for Chapter 2 indicates that there are Sections 2.4.1, 2.4.2, and 2.4.3 within this chapter. These three sections cannot be found in Chapter 2 of the main text.

Copy of this approval is included with this application as Item Number One, included with this chapter.

"Item Number One" is not included in Chapter 2 as indicated.

Page 2-7

Plate 3-4 shows the mine development plan by seam during each of the next five years, then for each five-year period thereafter for the life of the mine.

Plate 3-4 is not included in Chapter 3 as indicated. Our document copy indicates only Plates 3-1 and 3-2 in Chapter 3. This raises a question as to the status of Plates 3-3 and 3-4. Is Plate 3-3 supposed to be included in Chapter 3 even though it has not been included? Is Plate 3-4 mislabeled or is there a Plate 3-4 that needs to be included in Chapter 3?

Page 2-9

As required by UMC 800.11 and 30 CFR 800.11, the applicant will upon approval of this application, file copies of a Performance Bond conforming to 30 CFR 805 and 806 and UMC 805 and 806. Reclamation costs relevant to this bond are detailed in Section 3.6.7.

Section 3.6.7 is not included in Chapter 3 as indicated. This section is also referred to on page 3-13. Does this section need to be included or deleted?

Section 2.2.8 lists coal mining permits held by the applicant and principal shareholder.

Section 2.2.8 does not show coal mining permits held by the applicant or the principal shareholder as indicated in Chapter 2. This section only lists the name of the proposed mine.

Plate 2-1

This plate indicates Tract 1 as containing 80.00 acres, and Tract 2 as containing 75.23 acres. However, Tract 1 actually contains 83.64 acres, and Tract 2 contains 77.53 acres. The total acreage is 161.17 acres, not 155.23 acres as shown.

Page 3-1

Plate 3-1 shows the location of all surface facilities. In addition an accurate determination of where each facility is in relationship to the existing topographic as well as structural fixtures such as highways.

Plate 3-1 does not show any surface facilities as indicated. It is a layout of the underground mining configuration. The plate needs to be relabeled or redone to show the specific information as designated above.

Page 3-2

There are no processing or preparation facilities at this site.

It is indicated that there are no processing or preparation facilities at the mine site. A Forest Service employee did observe a crusher on site February 7, 1985.

Page 3-4

Plate 3-1 shows the location of all roads in the permit area. Total area for surface disturbance on the existing permit is approximately 6.6 acres. Individual areas are shown on Plate 3-1.

See previous comments concerning Plate 3-1 on page 3-1.

Page 3-5

Projected mine development in Tract 2 is shown on Plate 3-2 (Lower Seam) and Plate 3-3 (Upper Seam).

Plate 3-2 is titled 'Subsidence Monitoring Map', and there is no Plate 3-3 in Chapter 3 as indicated. The plates appear to be mislabeled while others are missing.

Page 3-6

Roof control is described in the approved roof control plan (Appendix 3A).

The roof control plan (Appendix 3A) is not included in the main text of Chapter 3 as indicated.

Page 3-8

Manmade features and structures do not exist on the mineable portion of the permit area.

This paragraph indicated no man-made features or structures exist on the

mineable portion of the permit area. Cadastral survey monuments exist within the angle of draw zone as shown on Plate 3-2. Any disturbance to such monuments will require that the monuments to be replaced or restored as per Special Stipulation #15 found in Federal Coal Lease SL-062648.

Page 3-17

Projected mining by year is shown on Plates 3-2 and 3-3.

See the previous comments for Plates 3-2 and 3-3 on page 3-5.

The acreage of this proposed Tract 2 Permit Area is 75.23 acres. This is shown on Plate 2-1 and 3-1.

See the previous comments on acreages for Tract 2 on page 1-1 and Plate 2-1. Also see the previous comments concerning Plate 3-1 on page 3-1.

This mining is shown by year on Plates 3-2 and 3-3.

See the previous comments for Plates 3-2 and 3-3 on page 3-5.

Page 3-18

Since the current (and likely future) land use is for dispersed, non-developed recreation, and since the operation on this permit area involves no surface disturbance, no impacts are expected to the current or future land use.

This paragraph should also include wildlife, and livestock grazing as well for the current land use.

Page 3-19

See Chapter 7, Sections 7.1.4 and 7.2.4 for a complete discussion of the hydrology of the area.

Section 7.1.4 is the 'Mitigation and Control Plan', and Section 7.2.4 is the 'Groundwater Monitoring Plan'.

See Chapter 7, Sections 7.1.6 and 7.2.6.

The Table of Contents for Chapter 7 does not include either Section 7.1.6 or 7.2.6 as being in Chapter 7. Neither one of the sections can be found in the main text of Chapter 7.

Page 3-23

Only two species found in the area are on the endangered species list; the bald eagle and peregrine falcon.

See the previous comments about Golden Eagles on page 1-2.

Page 4-3

Grazing, oil and gas and other mineral leases for the permit area will be supplied to the Division upon the issuance.

Federal Coal Lease U-062648 occupies some of the same land area as the Crandall Canyon Sheep and Goat Allotment, and Federal Oil and Gas Lease U-15208.

Page 4-4

There are no active oil and gas leases within the area.

See the previous comments on oil and gas leases on page 4-3.

Page 6-10

The anticline and syncline axis have a predominant east-west orientation, while the fault zones are generally oriented north-south (see Figures 6-2 and 6-3).

Figure 6-2 is not included in Chapter 6 as indicated.

Page 6-12

Coal reserves are calculated for the upper seam, based on an average coal height of 10' over 75.23 acres. The lower seam reserve figure is calculated in the same manner using an average coal height of 6'. Recoverable reserve is based on 50% of in-place reserve. The following is a breakdown of reserves by seam:

<u>Seam</u>	<u>In Place (tons)</u>	<u>Recoverable (tons)</u>
Blind Canyon	1,316,000	658,000
Hiawatha	790,000	395,000
TOTAL	2,106,000	1,053,000

See comments for acreage calculations concerning Lease Tract 2 on page 1-1.

The new mineable coal for Lease Tract 2 is estimated to be approximately 1.5 million tons, which does not coincide with the above figures for In-Place or Recoverable coal tonnages. Genwal Coal Company should update the MRP and this PA with data collected from their recent in-mine core drilling program.

Appendix 11-1, Page 5

To control dust emissions from road travel by coal haulage vehicles, we will gravel the haulage-access road and periodically water the road, the water to be mixed with a dust palliative as per manufacturer's directions.

We refer you to Special Stipulation #8 in the lease agreement, and to Management Requirement #21 in the EA approved May 18, 1981 for the Crandall Canyon road and bridge.

SPECIAL STIPULATION #8 - The lessee shall provide for the suppression and control of fugitive dust on all haul roads, and at coal hauling, transportation, and storage facilities. The migration of road surfacing material shall be controlled by watering, chemical treatment, or hard surfacing. Loss of gravel shall be periodically replaced.

MANAGEMENT REQUIREMENT #21 - A pavement design and structure (surface treatment or asphalt layer) must be provided that will prevent losses from the roadway during snow removal operations, from heavy truck traffic on steep grades, fugitive dust, and waterborne sediments during rains. A timetable for installation of this complete, will be furnished by the Forest Service.

To control dust emissions from road travel by access vehicles, we will use the same control methods as above with the same efficiency and reduce our total emissions from 16.98 lbs. per day to 2.6 lbs. per day.

See the response immediately above that quotes Special Stipulation #18 from the lease agreement, and Management Requirement #21 in the EA approved May 18, 1981 for the Crandall Canyon road and bridge.

The Forest Service consent on May 11, 1983, to Genwal's MRP in Crandall Canyon was based on the assumption that the company would adhere to the 23 management requirements included the EA. To date, those stipulations which have not been complied with are listed as follows:

2. Public parking must be separate from mine parking and allow for vehicle turn-around.
3. The Forest development road will be separate from and compatible with the mining operation.
4. The road through the mine site will be designed and maintained so that drainage off the road surface will be into the sediment pond for treatment.
6. The Forest development road through the site will not be used as part of the coal handling operation.
7. The sediment pond must be designed and maintained to meet Forest Service and OSM specifications.
10. An adequate sewage disposal plan will be submitted and when approved will be adhered to.
18. Prior to mining, the lessee shall secure adequate baseline data to quantify the existing surface resources on and adjacent to the lease area. The data will be gathered in consultation with and concurrence by the surface managing agency, and shall be adequate to locate and quantify the inter-relationships of the geology, topography, surface hydrology, vegetation and wildlife. The baseline data will be established so that future observations can be made at regular intervals for comparison.

19. The lessee shall establish a monitoring system to locate and quantify the progressive and final effects of underground mining activities on the land surface, the underground and surface hydrology and on the vegetation. The monitoring system shall utilize techniques which will provide a continuing record of change over time. The monitoring shall be an extension of baseline data at representative locations and will be conducted in a manner approved by the surface managing agency in consultation with the State and Federal regulatory agencies.
20. All drainage facilities will be designed and maintained to adequately control the water and prevent erosion.
21. Adequate drainage and sedimentation facilities must be designed and maintained to pick up and treat water intercepted on the disturbed areas of the mine site.
22. The mining company shall provide the Forest Service with an unencumbered right-of-way across any fee lands encountered for the reconstruction of the Forest development road.
23. The site will be so constructed as to encompass the entire surface facilities for the mining operation providing for unrestricted thru-road access while providing adequate protection of the adjacent stream.

The Forest Service is requesting that Genwal comply with those management constraints which have been disregarded to date.

If we can be of further assistance, please contact the Forest Service.

Sincerely,



for  
REED C. CHRISTENSEN  
Forest Supervisor