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STATE OF UTAH  
NATURAL RESOURCES  
Wildlife Resources

*orig mine file  
cc L Braxton  
S Linner*

Norman H. Bangerter, Governor  
Dee C. Hansen, Executive Director  
William H. Geer, Division Director

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December 18, 1985

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DIVISION OF OIL  
GAS & MINING

Dr. Dianne R. Nielson, Director  
Utah Division of Oil, Gas and Mining  
355 West North Temple  
3 Triad Center, Suite 350  
Salt Lake City, UT 84180-1203

Attn: Lowell Braxton  
Susan Linner

*AM/015/032  
#2*

Dear Dianne:

The Division has evaluated Genwal Coal Company's October 31, 1985, response to a determination of completeness review (tract 2), and their November 21, 1985, "Fall Inventory of Seeps and Springs . . ." submitted as an addendum to their Mining and Reclamation Plan at the Crandal Canyon mine. We have no concerns relative to data presented in the "Fall Inventory of Seeps and Springs . . .", however, the Company's response to the Doc review still leaves questions similar to those posed in our September 6, 1985, comments.

Page 7-21 (revised 10-31-85), Paragraph 2 and 3 -- The MRP indicates that wildlife's use of the mine permit area is limited. Our earlier comments concerning such (10-1-85, 9-6-85, and 3-10-81) remain valid. The MRP must be corrected to reflect the relative biological value of various amenities of wildlife habitat and status quo of wildlife use.

Paragraph 6 (7.1.5 mitigation and control plans -- revised 10-31-85) -- The applicant fails to recognize the critical value of seeps and springs to wildlife. This results in an insufficient mitigation plan relative to subsidence; one must be developed. Note, this paragraph page conflicts with the applicants data in chapter 10 (page 1, paragraph 2, 10.1 scope -- revised 10-31-85) that recognizes subsidence as a potential impact to wildlife.

Chapter 10, page 2, paragraph 1 -- revised 10-31-95 (10.4 expected impacts on fish and wildlife) -- Negative impacts from subsidence could be expected over a wide array of terrestrial and aquatic amenities of

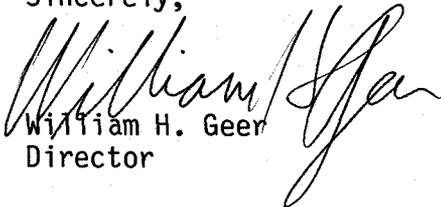
Dr. Dianne R. Nielson, Director  
Attn: Lowell Braxton and Susan Linner  
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wildlife habitat. Note, DWR correspondence to applicant (10-2-85) concerning wildlife/subsidence relationships.

Paragraph 2 (10.5 mitigation plans) -- The first sentence has a typographical error ("since there are no critical periods . . .") and should be changed to read as follows: "since there are critical periods".

Thank you for an opportunity to review the MRP and provide comment.

Sincerely,

  
William H. Geer  
Director