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United States
Department of
Agriculture

Forest
Service

Manti-LaSal
National Forest

599 West Price River Drive
Price, Utah 84501

Reply to: 2820

Date: November 5, 1986

Mr. Rick Holbrook
OSM - Reclamation and Enforcement
Brooks Towers
1020 15th Street
Denver, Colorado 80202

Dear Mr. Holbrook:

The Manti-LaSal National Forest has reviewed the Tract 1 Mining and Reclamation Plan for Genwal Coal Company's Crandall Canyon Mine Mid-Term Review. Our comments are as follows:

1. Section 3.2.1

The discussion on how Forest Development Road 50248 will be administered within the permit area is confusing. Use and maintenance of this road, both within and outside the permit area, is under jurisdiction of the Forest Service and all work and maintenance must be consistent with the road-use permit.

The topsoil stockpiles located off of the permit area on National Forest System lands, will be authorized by a special-use permit. Measures taken to protect the stockpiles from erosion and contamination will be approved by the Forest Service.

2. Section 3.2.8

The only discussion in this section is to refer to the Chapter 3 Appendix. Except for Plate III-1, which shows the surface facilities, there is no other discussion. The reference should direct the reviewer specifically to the plate and to the hydrology section in Chapter 7.

We have a concern with the 42" culvert that was installed at the west end of the permit area. The pipe has several horizontal and vertical direction changes rather than installed in a straight line as shown on Plate III-1. If the drainage could produce the 80 to 100 cfs to cause the pipe to run full, anchoring may not be adequate to withstand the thrust forces produced.

3. Section 3.2.10

Forest Service and public traffic will also utilize the Forest Development Road from the truck turn-around area to the main pad area and beyond to the Forest visitor parking area.

4. Plate 3-1

The berm along the south edge of the Forest Development Road, shown on the July 3, 1986, version of this plate, was removed to provide adequate drainage for the road. The plate should be revised to reflect this change.

The area identified as Forest Service Parking should be labeled Forest Visitor Parking.

Section 3.4.6.1 states that no powerlines will be constructed because a mobile generating unit will supply power to the mine site. Genwal Coal Company has started construction of a suspended power transmission line. This plate and the narrative must be amended to include this facility.

5. Section 3.3.2.2

This discussion should state that the coal seam does not lie under any stream or structure, rather than stating that no stream or structure lies under the coal seam.

6. Section 3.3.9.2

The Forest Service will not allow potentially contaminating solid wastes, such as oil-contaminated material, oil cans, metal scraps, and belting, to be disposed of underground.

7. Section 3.5.2

The word grazing should be replaced with the word growing.

The narrative says that the stockpiles will be located within the permit area. The soil stockpile areas shown on Plate 3-8 are outside the permit area and will be authorized by a Forest Service special-use permit.

8. Plate 3-~~7~~ 7

This plate needs a north arrow and some means to correlate the underground workings with the surface location.

9. Item 3-9

The October 24, 1985, letter from DOGM to Genwal Coal Company states that excess spoils and/or coal-processing waste must be disposed of within the permit area in accordance with UMC 817.71. Detailed plans are needed for our evaluation.

10. Section 7.2.3.1

The United States of America - Forest Service claims instream flows in Crandall Canyon immediately below the point of diversion for Genwal Coal Company's mining operation. The quantification of these flows was filed with the Seventh Judicial District Court of Utah on August 19, 1983, as a part of the adjudication of the San Rafael River Basin. These waters are needed to fulfill the purposes of the National Forest as described in the

Organic Act of August 19, 1897, and the Multiple Use-Sustained Yield Act of June 12, 1960. These waters are needed to preserve and restore the natural and beneficial uses of floodplains under Executive Order 11988.

One claim is given under the Organic Act (Exhibit 1) and a second claim is given under the Multiple Use-Sustained Yield Act. Enough water is needed to fulfill both purposes, but the two claims are not additive. A composite of these flows must be prepared.

The claims presented here are for the mouth of Crandall Canyon and may be extrapolated upstream by the formula given in paragraphs 6a and 6b of Exhibit 1.

Since Genwal Coal Company diverts water from Crandall Creek for mine use, they must assure that minimum instream flows are maintained below their diversion point.

11. Section 9.4

Sensitive plant Hedysarum occidentale var. canone has been located adjacent to the permit area and may, in fact, be in the permit area. This section nor the Vegetation and Terrestrial Wildlife Report included as Item 9-1 discuss this plant.

12. Section 12.4.3

We want to reiterate the fact that Genwal Coal Company is operating under a set of lease stipulations that contain requirements for mitigation of subsidence effects.

13. Section 9.5

There may be some long-term effects to vegetation due to subsidence and the related effects to ground and surface water. Effects to water may start a chain of effects to other surface and subsurface resources. Resources must be monitored as required by lease stipulations to determine and quantify any such effects.

We have not routinely received copies of all water monitoring reports. It will be necessary for the coal companies to submit a copy directly to the Forest, or for OSM or the Division of Oil, Gas and Mining to forward a copy to the Forest.

Sincerely,

/s/ William H. Boley

for
REED C. CHRISTENSEN
Forest Supervisor

Enclosures

cc: L.Braxton - DOGM, D-3, C.Reed

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