



State of Utah

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DIVISION OF OIL, GAS AND MINING

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October 12, 1988

TO: Susan Linner, Permit Supervisor

FROM: Lynn Kunzler, Reclamation Biologist *LK*

RE: Repermit DOC Review and New Lease Area, Genwal Coal Company, Crandall Canyon Mine, ACT/015/032, Folder #2, Emery Co. Utah

Summary:

Genwal's submittal received on August 15, 1988 has been reviewed for completeness and adequacy for repermitting and for the permitting of the new lease area. For repermitting, the plan is considered complete for biological resources and plans and land use information and plans. However, there are a few technical items that need to be clarified. The new lease portion cannot be considered complete until comments under UMC 784.21 are addressed.

Analysis:

UMC 783.21 Fish and Wildlife Information - 1k

The use of wildlife on the permit area as discussed in Section 4.4.2 of the MRP refers only to big game. This needs to be corrected to refer to wildlife in general as using the permit area.

UMC 784.21 Fish and Wildlife Plan -1k:

The MRP does not address the potential impacts on raptor nests due to subsidence, nor does it propose appropriate mitigation for impacts. This must be addressed adequately before the new lease area can be approved.

While the MRP does not provide 'as-built' designs for power poles to demonstrate that raptor protection technology was incorporated, the MRP does state that poles were constructed to be raptor safe. Inspection of these poles by the Division's Biologist shows that all poles are 'armless' and thus would not pose as a hazard to raptors. Therefore, this concern is resolved.

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General Comment:

Section 3.5 (page 3-27) indicates that there is 87.46 acres in the permit area. This apparently does not include the acreage for the new lease area. This needs to be provided.

Recommendations:

The repermit could be approved with the following stipulation. However, the New Lease should not be approved until the raptor issue is resolved (see comments under UMC 784.21) and the acreage for the new lease is provided (see general comment).

Stipulation UMC 817.97 - (1) - 1k:

Within 30 days of permit approval, the operator will revise section 4.4.2 of the MRP to show that Wildlife in general (and not just big game) utilizes the permit area.

cc: J. Leatherwood
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