

Reply to: 2820

Date: February 28, 1991

Lowell Braxton
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Division of Oil, Gas and Mining
355 West North Temple
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DIVISION OF
OIL, GAS & MINING

RE: Application by Genwal Coal Company to add NEICO. State Leases ML-21568 and ML-21569 to the Crandall Canyon Mine Permit Area

Dear Lowell:

We have reviewed Genwal Coal Company's application and have four concerns which involve possible effects to National Forest System lands adjacent to the lease areas:

1. Watershed conditions on the State lands associated with the leases and some adjacent National Forest System lands are poor resulting in a high rate of erosion and sediment loading in Crandall and Huntington Creeks. Mining should be conducted in a manner which will not cause unstable conditions, increased erosion and further degradation of the watershed.
2. The headwaters of several drainages are located in the State leases. The major drainages include the South Fork of Horse Creek, Crandall Creek and Blind Canyon Creek. These drainages supply a significant amount of flow to Huntington Creek which is a major culinary and agricultural water source and supports an important trout fishery. Mining must be conducted in a manner which will not decrease the quality and flow of these drainages and impact Huntington Creek.
3. The Forest Service has claimed water rights on springs and stream segments which lie within the State leases. The surface water needs to be protected, monitored and replaced if impacts from mining occur.
4. If adjacent National Forest System lands will be affected, an environmental analysis will be needed to document these impacts and determine what measures will be needed to mitigate them.

Our comments on the permit application package (PAP) as follows, are generally related to these concerns:

Section 14.3.3.1.2 Monitoring Procedures

Vegetation mapping presented in the permit application package is very broad. Vegetation mapping of communities should be done considering the major overstory and major understory species.

Section 14.5.1 Ground Water Hydrology

The operator has used ground water hydrology information presented by Lines, 1985, for the Trail Mountain area to describe ground water conditions in the lease area. Trail Mountain is hydrologically isolated by Cottonwood Creek and the Joes Valley Graben. Ground water conditions in the two distinct areas are not likely to be the same.

The operator has not adequately determined the inter-relationship between geology and hydrology. It has not been determined from where the ground water system is recharged or in what direction ground water flows. Information on which formations are perched and regional aquifers is not clear. Information is needed to determine how the emergence of springs is related to the geology.

The operator has not presented baseline information needed to determine premining water quality and flow in the springs which lie above and adjacent to the mine area.

The information discussed above needs to be collected and presented in order to determine if mining will impact the ground water system. The conclusions in the mine plan that the ground water system will not be significantly altered by mining is not adequately supported by data.

Section 14.5.1.5 Mitigation and Control Plan

It is stated that the Division of Wildlife Resources will be consulted if mining causes diminution of water sources to develop plans for construction of guzzlers. This commitment is not adequate. The operator must commit to replace water quality and flow in the springs and surface drainages in the event that they are significantly disrupted by mining.

Section 14.5.1.6 Ground Water Monitoring

The operator has made a commitment to monitor two springs within the leases which involve water rights claims. In order to determine if mining is causing impacts to the ground water and surface water system, it will be necessary to monitor additional springs already identified within the potential subsidence area which emit from different formations.

If the geologic and ground water information shows that the springs which lie to the west of the mining area along Joes Valley could be affected by mining, it will be necessary to add representative springs to the monitoring plan.

Section 14.5.2 Surface Water Hydrology

This section is not adequate. It must be determined whether or not the drainages which are proposed for undermining are perennial or intermittent and how much of the flow is associated with springs. Baseline information on quality and flow is required. The permit application package does not present any of this required information.

If any of the drainages are determined to be perennial, it must be determined how much of the flow in Huntington Creek is attributed to these drainages and they should be protected from subsidence to assure continued flow across the lease area and adjacent National Forest System lands.

On National Forest System lands, mining which could cause subsidence is not permitted beneath perennial streams.

Section 14.5.2.4 Mitigation and Control Plans

The water rights claims have been identified but the flows of the drainages have not been established by the operator. A monitoring plan must be implemented to monitor impacts to flow and quality and a commitment must be made that the operator will restore the flow and quality of water across National Forest System lands in the event that impacts from mining are detected.

Section 14.5.2.5 Surface Water Monitoring Plan

If they are determined to be perennial, the South Fork of Horse Creek and Crandall Creek must also be monitored.

Section 14.6.2.2 Subsidence Control and Mitigation Methods

The operator should commit to mining in such a manner as to prevent inducing escarpment failures, landslides and dewatering of perennial drainages. A commitment to notify the regulatory authority in the event that landslides and subsidence cracks are induced is needed. The operator also needs to make a commitment to reclaim any disturbance that is determined to cause impacts to watershed conditions or accelerate erosion.

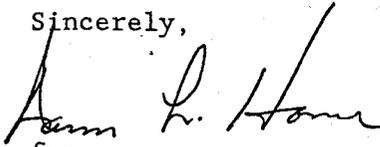
Figure 14-9 depicts that the limit of predicted subsidence extends beyond the State leases onto adjacent National Forest System lands. Subsidence outside of the boundaries of the State leases could impact Federal coal and surface resources. The mine plan should be revised to prevent subsidence beyond the lease boundaries. The alternative would be to obtain the necessary consent from the BLM and Forest Service which will first require completion of an environmental analysis.

If any of the drainages which drain the State leases are determined to be perennial, the Forest Service will not allow mining which will cause subsidence under these drainages on National Forest System lands.

The permit application package and technical analysis need to address the potential for impacts to adjacent National Forest System lands. If it is determined that there will be impacts to National Forest system lands, an environmental analysis and appropriate documentation will be required. Please

send us copies of any updated materials and the draft technical analysis for review. If you have any questions, please contact us at the Forest Supervisor's Office in Price, Utah.

Sincerely,



for

GEORGE A. MORRIS
Forest Supervisor

cc:

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C.Reed