



State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF WILDLIFE RESOURCES

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AUG 25 1995

August 22, 1995

Mr. Dave Darby, Reclamation Hydrologist
Utah Division of Oil, Gas and Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180

Re: Genwal Mine Plan Modification-Longwall Mining, Crandall Canyon Mine,
Act/015/032-95F, Carbon County, Utah, Folders 2 and 5.

Dear Mr. Darby:

The Utah Division of Wildlife (DWR) has reviewed the above mentioned mine plan amendment proposed by Genwal Resources. We have the following comments.

1. Our Southeast Regional Office in Price will be measuring the flow of Crandall Creek this fall. We request these measurements be referenced to decide at what location the stream becomes perennial.
2. DWR is concerned that data used to classify the stream were subjective statements of observations, not objective, quantitative measurements of the stream. The data was not collected specifically to classify the stream, but were observations made while working on other projects.
3. DWR requests that the permit reflect what can be expected to occur in the stream during normal water years. The EIS survey was also taken after several years of prolonged drought in the area. The average flow of Crandall Creek can definitely be expected to be greater during normal years all along the stream bed.
4. Having the permit reflect normal water years will avoid the problem of dewatering, where water rights are firmly established downstream.
5. DWR requests that any spring complexes and their associated flows be protected as perennial streams.



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6. The word "location" from the Forest Service definition of a stream is taken out of context in Mr. Gainer's letter, dated June 2. When used for defining a stream, the word "location" in the Forest Service definition applies only to locations that are or can be streams. It does not refer to any random location on the forest or to manmade ditches along roads.

We appreciate the opportunity to review this application and provide our input. Please contact Bill Bates or Ben Morris, at (801) 637-3310, if you have any questions regarding our comments.

Sincerely,



Robert G. Valentine
Director