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State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF WILDLIFE RESOURCES

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February 5, 1996

FEB 7 1996

Mr. James W. Carter, Director
Utah Division of Oil, Gas and Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180

Attention: David Darby

Re: Revised mine plan submittal, longwall mining under Crandall Creek, Genwal Resources Inc., Crandall Canyon Mine, ACT/015/032-96A, Folder #2, Emery County, Utah

The Utah Division of Wildlife Resources (DWR) has reviewed the above mentioned mine permit amendment and met with a representative from Genwal Mine concerning this project. We have the following comments:

1. There is a probability that mining under Crandall Creek could fracture the stream bed causing loss of water in the stream channel and a wild Yellowstone cutthroat trout fishery. We request that the Division of Oil, Gas and Mining (DOGM) take a hard look at the probability of the stream bed being fractured at anytime during mining or in the years to follow. DOGM should restrict or prohibit secondary mining under the stream if there is any possibility of subsidence in the area that may result from mining activity.
2. We request that DWR be immediately notified if surface flows from existing drainages are interrupted by subsidence and/or subsequent mine inflows are observed if mining is permitted. We request this notification so that we may assess the impact to the stream bed/fishery downstream and take/direct appropriate action to lessen the impact of dewatering.
3. In the Stream Flow Interruption Mitigation procedures #1, the initiation of field inspection after drainage flow interruptions due to subsidence and/or observed mine inflows needs to be shortened from 72 hours to a maximum of 24 hours.



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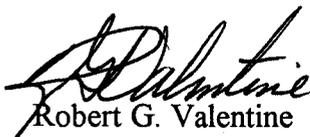
4. The flexible pipe that is to be used to bypass the flow while the remediation measures are being installed needs to be obtained and stored at the mine prior to mining under the forks of Crandall Creek. This pipe needs to be of sufficient size to handle a significant spring runoff.

5. *supports* We recognize and appreciate Genwal's effort to set up the mine plan so that necessary walls are under the stream beds as much as possible. We request that the mine plan officially recognize the longwall barrier walls between the 2nd west and 3rd west panel, and the wall between the 5th west and 6th west panel as a stream buffer zone with no secondary mining of the wall. Unless, subsidence becomes a problem in the future, we are not requesting that additional distance from the walls be added as a no secondary mining stream buffer zone. We have been assured by Genwal that no secondary mining can be done in the room and pillar corridor under the north and south forks directly west of the current stream buffer zone at the edge of Section 1 (Forest Service) and Section 2 (State Land). Therefore, we request that the steam buffer zone be officially extended across the room and pillars to the edge of the longwall panels.

6. UDWR maintains, through on site surveys, that Crandall Creek is perennial well beyond the forks. We recognize that there may be sufficient overburden between the stream bed and mined coal to moderate fissuring of the ground during subsidence.

We appreciate the opportunity to review this permit renewal and provide our comments. If you have any questions, please call Ben Morris or Bill Bates at (801) 637-3310.

Sincerely,


Robert G. Valentine
Director

cc: Carolyn Wright, State Office of Planning and Budget

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