



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Utah State Office

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INCOMING
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CC: Mary Ann

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JUN 11 2004

DIV. OF OIL, GAS & MINING

JUN 10 2004

IN REPLY REFER TO:

3480

UTU-78953

(UT-923)

Utah Coal Program
Utah Division of Oil, Gas, and Mining
P.O. Box 145801
Salt Lake City, Utah 84114-5801

Re: BLM comments on "South Crandall Lease Revision, Genwal Resources, Inc., Crandall Canyon Mine C/015/0032, Manti La Sal National Forest Response", dated March 4, 2004.

Mary Ann
Dear ~~Ms. Wright~~:

BLM has reviewed the Manti La Sal National Forest response dated March 4, 2004, and has a few comments that you might want to take into account in your review/approval.

Chapter 5: The Resource Recovery and Protection Plan (R2P2) will contain the following:

1. Coal seam structure maps
2. Interburden maps
3. Cross sections
4. Mining methods
5. Plans for different mining methods

Subsidence Control Plan: Mining under Little Bear Canyon Creek with overburden less than 600 feet is covered by Federal Coal lease UTU-78953 Special Coal Lease Stipulation 9 and BLM will make a determination with the concurrence with the Forest Service if mining will be allowed underneath the perennial portions of Little Bear Canyon Creek.

There is no requirement in the Lease not to allow subsidence underneath power lines. This power line is to the mine and therefore is a resource recovery issue and will be handled by BLM.

Anticipated Effects of Planned Subsidence: BLM again will make the determination if subsidence will be allowed underneath Little Bear Canyon Creek. The PAP should acknowledge the lease stipulations and there should be a statement that a

determination will be made about mining underneath the Little Bear Canyon Creek at some time before mining proceeds underneath the stream.

Special Coal Lease stipulation 17 discusses mining within 1000 feet of the south east corner of section 8, but the lessee is required to submit a plan to the authorized officer for approval. BLM will administer the lease stipulations with any concurrence required from the Forest Service. The PAP should acknowledge this lease stipulation.

PHC and Aquifers: Recharge mechanisms for the Little Bear Canyon Spring are well understood. Most, if not all the major water source for the Little Bear Spring is coming from the Mill Fork Graben area. In the pre-leasing activities other sources of water for the Little Bear Spring were discussed but were dismissed due to the lack of recent factual data.

General:

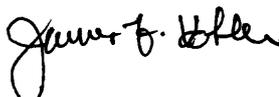
Lease Revision. The response from the Forest Service keeps referring to a Lease Revision. There is no lease revision or modification to Federal Coal Lease UTU-78953. It is unclear what is being discussed in this document with such references.

Effects of Mining Operation on Groundwater: The mining operation that is being permitted is to use room and pillar along with longwall mining methods to produce the coal in the lease. Subsidence of longwall panels therefore the assumption that is implied in the discussion and is one facet in the effects to the groundwater. Most springs and seeps (unless supported by a geologic structural feature) are supported by the surrounding areas that feed these systems.

Regional Surface Water Hydrology and Mine Plan Area Surface Hydrology. There is no such term as "perennially functioning" stream. A stream is perennial, ephemeral or intermittent. Riparian vegetation can be supported by mechanisms other than perennial streams. If the stream has sub-surface flow then the stream by definition is intermittent. The Forest Service comments provide no basis for the determination that the pre and post mining land use for Little Bear Canyon Creek must be identified as a Municipal Water Source.

If you have any questions, fell free to contact Mr. Stan Perkes at (801) 539-4036.

Sincerely,



James F. Kohler
Chief, Solid Minerals Branch

cc: PFO
UTU-78953