

UNITED STATES DEPARTMENT OF AGRICULTURE
FOREST SERVICE
55 South First East
Richfield, Utah 84701

Route
Ron
XMP
JWS

2820
Convulsion Coal Mine
M.T.M. see back pg.

October 18, 1978



#B



Letter ✓ w/mhl
Ron: Where are we
with this problem.
Should the Div. request
SUFCO to come in for a hearing?
XMP 11/16

0007

Mr. Ron Daniels
Division of Oil, Gas and Mining
1588 West North Temple
Salt Lake City, Utah 84611

Dear Ron:

At a recent meeting between agencies involved with surface activities at the Convulsion Coal Mine, a point of concern was made by the Office of Surface Management about how spoil materials were being disposed of at the mine. Larry Damrau, representative of OSM, was concerned about potential pollution of East Spring Canyon water from the spoil material. We certainly feel that his concern is legitimate. The limited area for surface facilities was a concern for us as resource managers. To mitigate potential sedimentation and pollution of East Spring Canyon Creek, we required that a 72 inch culvert be installed through the entire surface area. Runoff came into the culvert above the mine area and left below the mine area.

Precipitation runoff from the surface area where mining facilities are located is channeled through a sediment tank to remove oil, grease, and coal fines before being discharged into the canyon.

The Environmental Assessment Report prepared and approved by the Geological Survey, the regulatory agency for coal mines on Federal lands, did not recognize a need for a spoils material site. Southern Utah Fuel Company came to the Forest Service, as the surface management agency, for permission to continue the fill in East Spring Canyon as a spoils site. We reviewed the request with various resource specialists, such as hydrologist, engineer, watershed specialist, environmental geologist, and reclamation specialist. Our conclusion was to continue the fill in East Spring Canyon. Extension of the culvert would be necessary to prevent spoils material from entering the stream channel. This site would create the least adverse impact.

The other alternative was to haul the spoils material somewhere else for disposal. If this were done, it would create another area where unvegetated soil and rock material would have to be stabilized some time in the future. Since the fill in East Spring Canyon will have to be stabilized anyway, we take the position that this is the best site for

the spoils material disposal area. We feel the fill can be stabilized and revegetated to be compatible with natural surroundings.

We do recognize that formal approval has not been given by the regulatory agency for use of this area for spoils material disposal.

If your office has any questions or suggestions about this matter, please feel free to contact us. We appreciate working with you and your people on this matter of joint concern, and look forward to further pleasant working relations.

Sincerely,

Darrel C Hintze

For
CHARLES R. ALLRED
District Ranger

I believe we should be cautious if division takes position allowing mine to continue present practice! It not only violates OSM performance standards, but could present a potential danger with the possibility of mass movement. I feel that only limiting to two alternatives mentioned in this letter is unrealistic and other opportunities are available, and should be explored. At least a minimum of 1.5 static safety factor should be required with a reduction in the present slope.

M.S. M

11/24/78

Mike M,

11/20/78

I contemplate that we will be making a decision on this refuse facility in the next few days. It will be that we agree that waste should continue to be deposited as done previously.

Do you have any problems with this?

km

~~To many problems as I see it should consult with F.B. eng and mine rep. first!~~

see pg #2 M.P.M.

11/28

Mike M,

You can handle this.

km

Contt Bonstain -

Since this has
been forwarded to
OSM and it is a
led project, lets
see what they do.

How come we weren't
invited for the inspection?