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United States Department of the Interior

OFFICE OF SURFACE MINING
Reclamation and Enforcement
POST OFFICE BLDG. RM. 270
1823 STOUT STREET
DENVER, COLORADO 80202

March 16, 1979

#2

Mr. Ron Daniels
Staff Assistant
Division of Oil, Gas & Mining
Department of Natural Resources
1588 West North Temple
Salt Lake City, UT 84116

Dear Ron:

As you know, SUFCO has asked for Federal approval to extend underground works into newly leased Federal lands.

We have made out "completeness" review of the SUFCO mining plan. Attached is a list of the points we believe should be expanded upon to show the operation will comply with reclamation performance.

SUFCO is getting a copy of this letter and the attachment. Please contact John Hardaway or Murray Smith if you have questions.

Sincerely,

Donald A. Crane
Regional Director

cc: F. S. Manti LaSalle
F.S. Fishlake N.F.
USGS, Moffitt
USGS, Horn
SUFCo

3. If the new waste disposal area is to be reclaimed separately from the larger fill, there should be a separate discussion of reclamation.

WATER QUALITY

1. The plan does not show that all surface drainage from the disturbed area will pass through the sediment trap on top of the fill or through the proposed sediment pond. The showing should be made with contour maps which give location of all diversion structures.

SURFACE WATER MONITORING

1. The plan should explain the type of analytical quality control system to be utilized.

2. Manganese should be added to the routine analyses list,(Table 10 of the Hydrology report).

3. Monitoring reports should be submitted within 60 days of sample collection.

4. Sediment control pond discharges should be added to the monitoring schedule.

5. Results of monitoring to date should be submitted to OSM, to aid in plan analysis.

DIVERSION AND CONVEYANCE OF OVERLAND FLOW

1. The plan should include a map showing all diversion ditches, pipes, culverts or berms. The design criteria and specifications for these sturctures should be included in the plan (include cross sections). Diversions should be identified as temporary or permanent. Restoration practices should be specified or there should be justification for permanent diversions. The proposed final reestablished channel through the present fill area is a permanent diversion and must be designed accordingly

DISCHARGE STRUCTURES

1. Specifications for discharge control energy dissipaters should be provided for diversions.

GROUND WATER SYSTEMS

1. The hydrology report indicated that another survey of springs and seeps would be conducted in the spring of 1978. Results of the survey should be submitted.

2. The plan indicates the company obtains water from the alluvium in Quitchupah Creek at one point and discharges waste water at another point downstream. Both operations should be described in more detail. Is there a permit for the discharge? If not, a permit must be obtained.

HYDROLOGIC IMPACT OF ROADS

1. A general drainage plan for roads should be provided. The plan should include maps and cross sections to show road locations, grades, drainage structures, general design, materials, etc. Road maintenance procedures should be described.

SOILS

1. The plan should include soils maps for the presently disturbed areas (including immediately adjacent areas and for areas to be disturbed by actual surface operations exclusive of subsidence). Topsoil amounts, characteristics, reclamation suitability, handling storage and reuse should be discussed. What type of material and how much will be used to final surface the present tipple site? Where will the material come from?

VEGETATION

1. SUFCO's vegetation map was referred to in the text, but not included. Copies should be submitted.

WILDLIFE

1. There should be a more detailed description of plans to protect wildlife during and after operations by controlling and posting speed limits, limiting night time coal haulage, preventing stream degradation, controlling access, revegetation, reporting sitings and effects on rare and endangered eagles, restricting seasonal use of areas of special wildlife value, etc.

DUST CONTROL

1. The plan should describe dust control measures for the tipple, roads, ponds, stock piles and other mine use areas. The plan should describe practices, equipment, chemicals, or other materials, points or application of suppressants, amounts of application, etc. Describe air quality monitoring program.

SUFCO
ADDITIONAL INFORMATION FOR MINE PLAN

GENERAL INFORMATION

1. Map #1A shows three sets of entries breaking out into North Fork Quitchupah Canyon. The plan should contain a schedule and description of any access road or site construction and surface facilities at the entries or at any other permit locations where future expansion will take place. There should be a discussion of the existing conditions (soils, vegetation, wildlife, archeology, hydrology, etc.) and of reclamation for any new access and site. If there are to be no new sites, the plan should so state.

SIGNS AND MARKERS

1. Sign design and placement should be specified. I.D. signs and topsoil signs will be needed.

LAND USE

1. The land use portion of the plan should give specific information on the grazing carrying capacities, condition of range, forest or range management practices, hunting or recreation use days, timber production, etc. Consideration should be given to different uses or capabilities in stream valleys, steep slopes and flatter mesa top areas. The section should address capabilities of land for uses beyond those presently in effect.

BACKFILLING AND GRADING ROAD CUTS, ETC.

1. The plan states that roads may or may not be reclaimed depending on Forest Service needs. There is no detail on which roads, or how roads would be reclaimed. There should be a commitment to a road abandonment plan which tells how road cuts would be backfilled, how roads would be graded or otherwise abandoned, stabilized and revegetated. Roads to be affected should be shown on a map. The plan should show how the abandoned road area will blend into the abandoned tipple site fill area.

2. There should be a contour map to show the proposed final surface configuration upon abandonment of the cut and fill area at the tipple site. The map should show how cut or fill contours would match with undisturbed surface contours. There should be an illustration of the reclaimed tipple surface area with and without road abandonment, if there would be differences.

DISPOSAL OF SPOIL AND WASTE MATERIAL

1. The plan should include description, and chemical and physical analysis of the mine waste material to show its potential for polluting water by leaching, for forming stable fills, and for supportive revegetation.

2. The February 5, 1979, mine plan addendum proposes a combination waste disposal fill-sediment pond, with a dam constructed of waste. 30 CFR 717.18 requires detailed design, construction and maintenance factors for dams constructed of waste materials. The mine plan must show that each requirement of 30 CFR 717.18 will be met.