

0038



United States
Department of
Agriculture

Forest
Service

Fishlake National Forest
115 East 900 North
Richfield, Utah 84701

Smith
File ACT/041/002
Folder No. 2
Copy to Sue
& Dave D

RECEIVED
SEP 20 1983

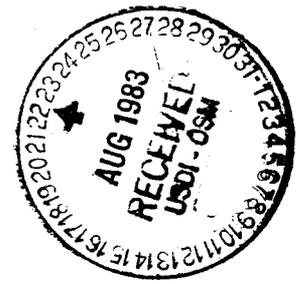
Reply to: 2800

Date: August 18, 1983

JIM

SEP 20 1983

DIVISION OF
OIL GAS & MINING



Mr. Allen Klein
Western Technical Center Administrator,
Office of Surface Mining
1020, 15th Street
Denver, Colorado 80202

Dear Mr. Klein:

The Fishlake National Forest has made an initial review of the Convulsion Canyon Mine Plan as submitted by Southern Utah Fuel Company.

We find the plan very difficult to review. The continuity and organization are poorly done. Material irrelevant to actual mining operation is in the plan, i.e., (1) Merrick and Company Drainage Facilities and Sediment Control Plan. This plan was not used. A system designed by Valley Engineering Company was installed for sediment control. (2) Why should a coal lease environmental assessment be part of a mine plan? Lease stipulations from the E.A. which affect mining can be addressed but not the entire E.A.

We have reservations about their being adequate top soil on site for reclamation as it occurs. Top soil will have to be brought in. Vol. 5, p. 37.

The discussion on hydrology is adequate however, the flume in North Fork of Quitchumpah used for part of the hydrology plan study has washed out every year since it was put in. Consequently, the data being gathered is not a true picture for this drainage. Volume 3 comment #4 USFS.

We feel the specifics of reclamation should be flexible with regards to "how" it should be done. The knowledge in 20-30 years could provide for better reclamation procedures than we have now. The "what" should be done can be specific.

The use of only native species for rehabilitation is not prudent. Some introduced species are better soil stabilizers than native plants.

It is our understanding that a mine run coal stock pile will not be used. If this is correct, why is it part of the plan?

Soil and vegetation maps lack landmarks such as section lines or numbers. It is impossible to correlate data to on-the-ground locations.

When we make our review of the environmental assessment that OSM will prepare, we may have additional comments. We do feel that you have the expertise to ensure



the mine plan meets the requirements of Chapter VII of 30 CFR. If this is done then our general needs have been met. If you need further comment or have a question about this letter, please feel free to contact Lynn Findlay or Darrel Hintze (FTS 584-8292).

Sincerely,

Dee B Thomas

For J. KENT TAYLOR
Forest Supervisor

Smith



United States Department of the Interior

FISH AND WILDLIFE SERVICE

ECOLOGICAL SERVICES
1311 FEDERAL BUILDING
125 SOUTH STATE STREET
SALT LAKE CITY, UTAH 84138-1197

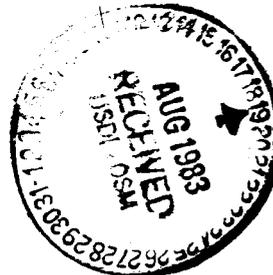
August 17, 1983

IN REPLY REFER TO:

MEMORANDUM

TO: Acting Deputy Administrator
 Technical Service Center West
 Office of Surface Mining
 Denver, Colorado
 Attention: Louis Hamm

FROM: Field Supervisor, Ecological Services
 Fish and Wildlife Service
 Salt Lake City, Utah



SUBJECT: 1983 Addendum for the Mining and Reclamation Plan, Convulsion Canyon Mine, Coastal States Energy, UT-0026-44 & 46

We have evaluated Southern Utah Fuel Company's response to the apparent completeness review (ACR) for the Mining and Reclamation Plan (MRP) at the Convulsion Canyon Mine. Our comments evaluate how the Company's response addresses issues that were stated in our letter of June 11, 1982 to your office and not specifically the Company's response to the Utah Division of Oil, Gas and Mining's ACR.

We are unsure that our raptor nest data has been transferred to the Company. We offer the following suggested statement to address our concerns and improve the MRP. We also suggest that the Company include a map in the MRP showing the locations of these nests.

Proposed Statement: The Company will avoid new or unnecessary activities near raptor nests when they are active and will consult with the USFWS when proposed activities will potentially impact active nesting attempts.

We believe the suggested changes will put the Company into a posture that complies with "The Eagle Protection Act" and the "Migratory Bird Treaty Act", as well as pertinent parts of UMC 817.97.

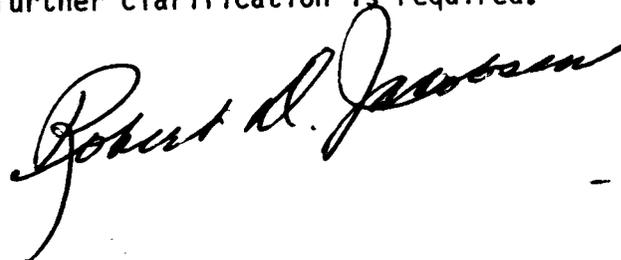
It is still not clear to us if the Company has committed to replacement of wildlife water sources lost due to subsidence. As subsidence is an issue at this site we feel the protection of these water sources is

extremely important. Similarly, if cliffs, trees or other structures supporting raptor nests, swifts, swallows, etc., are damaged or lost due to unexpected or uncontrolled subsidence we believe the Company should be committed to replacement or mitigation of these habitats also.

The FWS still feels that the Company should address the deer highway mortality issue expressed in our previous letter. Although they are not all proven techniques yet, vehicle whistles, highway reflectors, and deer crossing signs have some merit to being tried as solutions to the apparent collision problems. A monitoring program was suggested as a first step to determine if there is a problem with mine related traffic and precisely where it exists.

The FWS will rely on the judgement of your office as to what further actions are to be required of the Company in terms of enhancement (817.97a) if any. In the previous letter we suggested several ways to enhance wildlife habitat and offer our assistance if needed in the scoping of projects or possibly their implementation.

Please don't hesitate to contact us if further clarification is required.

A handwritten signature in cursive script, reading "Robert D. Johnson". The signature is written in black ink and is positioned to the right of the main body of text.

cc: RO/HR, DEN
DWR, SLC
DOGM, SLC

Smith



SL-062583
(U-921)

United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Utah State Office
2040 Administration Building
1745 West 1700 South
Salt Lake City, Utah 84104

IN REPLY
REFER TO:

August 9, 1983

Memorandum

To: Western Technical Center Administrator,
Office of Surface Mining, Denver
Attn: Mr. Walter Swain & Mr. Louis Hamm

From: Chief, Branch of Solid Minerals, SO-BLM
Salt Lake City

Subject: Coastal States Energy Company, Southern Utah
Fuel Company, Convulsion Canyon Mine, Sevier
County, Utah, Mining and Reclamation Plan (MRP)



The subject addendum material referred to in Mr. Swain's letter dated August 3, 1983, was delivered to this office by a company official on July 11, 1983, and July 26, 1983. The information was reviewed and placed in the appropriate part of the subject mining plan. This material comprising the July 1983 addendum to the subject MRP plan did not interfere with coal recovery procedures and does not conflict with future recovery of coal resources.

The total MRP plan submitted to this office is compatible with 30 CFR 211 rules, effective August 30, 1982, and will not conflict with our administration of the associated Federal coal leases. The total plan will achieve maximum economic recovery within the limits of the equipment and technology presently being planned and/or used.

We recommend approval of the underground mining plan part of the mining and reclamation plan permit application package.

J. Gordon Whitney
Acting

Smith



United States
Department of
Agriculture

Forest
Service

Fishlake National Forest
Richfield Ranger District
115 East 900 North
Richfield, Utah 84701

Reply to: 2820

Date: August 4, 1983



Mr. Walter Swain
Office of Surface Mining
Brooks Towers 1020 15th Street
Denver, Colorado 80202

Your Ref. Utah 0026

Dear Mr. Swain:

The Fishlake National Forest would like more clear, easy to understand subsidence monitoring information from Coastal States Energy Company for their Convulsion Canyon Mine. We have difficulty relating the current data to surface areas. We suggest a USGS quad map be used that shows location of both control points and subsidence points with appropriate identifying numbers; also a means of showing the elevation for each point prior to mining and as subsidence occurs. This could be done on a chart that shows monitoring point numbers and beginning elevations and subsidence elevations as they are determined.

Because the Forest Service has surface management responsibility in regards to coal mining on Federal lands administered by us, we want to be able to relate subsidence to the surface resources.

If you have any questions about this request please contact Darrel Hintze, FTS 584-8292 Ext. 102.

Sincerely,

Lynn A. Findlay

J. KENT TAYLOR
Forest Supervisor





United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Utah State Office
2040 Administration Building
1745 West 1700 South
Salt Lake City, Utah 84104

IN REPLY
REFER TO:

August 1, 1983



Memorandum

To: Utah Senior Project Manager, OSM, Denver

From: Chief, Branch of Solid Minerals

Subject: Southern Utah Fuel Company, Convulsion Canyon
Mine, Subsidence Report, 1982 Update

Your letter dated July 5, 1983, transmitted two maps for the subject report. The subsidence tables were not included.

This information will be put in the Convulsion Canyon mine subsidence file. We would appreciate a copy of the subsidence tables.

There are no conflicts with future recovery of coal resources.

J. Gordon White
Acting

Smith



United States
Department of
Agriculture

Forest
Service

Manti-LaSal
National Forest

599 West Price River Drive
Price, Utah 84501

Reply to: 2820

UT 26

Date: July 15, 1983

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Ron Naten
OSM - Reclamation and Enforcement
Brooks Towers - 1020 15th Street
Denver, Colorado 80202

L

Dear Mr. Naten:

The Manti-LaSal National Forest received two subsidence maps for Coastal States Energy Company's Convulsion Canyon Mine. Map 80-9B which shows some measured subsidence areas is a useful map. Map 80-10 has been deleted from the mine plan, and replaced by maps 80-10A and 80-10B. These two maps have the same legend yet indicate different mining projections for the next 18 months. Is this for different seams? What interval of time does the 18 months cover? The subsidence area cannot be readily discerned on map 80-10A.

If we can be of further assistance, please contact us.

Sincerely,

for
REED C. CHRISTENSEN
Forest Supervisor



Smith
6-C

BL-962583

Office of the Mining Supervisor
2040 Administration Building
1745 West 1700 South
Salt Lake City, Utah 84104

June 2, 1983

Memorandum:

To: Utah Senior Project Manager, Office
of Surface Mining, Denver

From: Mining Supervisor

Subject: Coastal States Energy Company, Southern Utah
Fuel Company, Convulsion Canyon Mine, Sevier
County, Utah, 1983 Addendum

The subject information forwarded with your letter dated May 3, 1983, has been reviewed as requested. The review of this 1983 addendum necessitated reviewing again, the eight-volume Mining and Reclamation Plan (MRP) as amended. In our opinion, the amended MRP is in compliance with the new 30 CFR 211.10(b) rules and is technically correct and should safely achieve maximum economic recovery of the coal deposits within the plan area.

Jackson W. Hoffitt

cc: BLM/Chrono
SUECO
McKean (2) ✓
DOGM

6-C

Smith

UNITED STATES
DEPARTMENT OF THE INTERIOR
OFFICE OF SURFACE MINING

CONFIRMATION/REPORT OF TELEPHONE CONVERSATION

TO	Name	Don Hanne	FROM	Name	Bob Benton
	Office	Tech Support - WTC		Office	Endangered Species USFWS
	Location	Denver, CO		Location	Salt Lake City, UT
	Telephone Number	327-2451		Telephone Number	588-4430

Purpose of Call:

Bob called to give me the USFWS determination regarding potential impacts of the SUFCO Convulsion Canyon on any listed T&E species.

After checking their files Bob said that the mine would have no effect on T&E species.

I told Bob I would document this in a phone memo and that this would serve as sign-off from the USFWS.

Explanatory Remarks:

Therefore, we have T&E clearance from the USFWS on the SUFCO, Convulsion Canyon Mine.

3/7/83

(Date)

D. R. Hanne

(Signature)