



United States  
Department of  
Agriculture

Forest  
Service

Manti-LaSal  
National Forest

599 West Price River Drive  
Price, Utah 84501

Reply to: 2820

Date: January 11, 1984

Mr. Louis Hamm  
OSM - Reclamation and Enforcement  
Brooks Towers - 1020 15th Street  
Denver, Colorado 80202

Dear Mr. Hamm:

This letter consolidates the three responses requested by OSM on form letters dated December 5, 1983, and two dated December 27, 1983.

The Forest Service has three major concerns associated with the development of the Convulsion Canyon Mine; the protection of Quitchupah Creek, the escarpments, and development of a suitable subsidence program. We refer you to special stipulations 9, 10, 13, and 16 found in Federal Coal Lease U-062453 readjusted effective March 1, 1982, and special stipulations 4, 5, and 6 found in Federal Coal Lease U-28297.

U-062453

9. Prior to mining, the Lessee shall perform a study to secure adequate baseline data to quantify the existing surface resources on and adjacent to the lease area. The study will be established in consultation with and approved by the Authorized Officer, Surface Management Agency; the Regional Director; and the District Mining Supervisor and shall be adequate to locate, quantify, and demonstrate the interrelationship of the geology, topography, all surface hydrology, vegetation, and wildlife. Baseline data will be established so that future programs of observation can be incorporated at regular intervals for comparison.
10. The Lessee shall establish a monitoring system to locate, measure, and quantify the progressive and final effects of underground mining activities on the topographic surface, underground and surface hydrology, and vegetation. The monitoring system shall utilize techniques which will provide a continuing record of change over time and an analytical method for location and measurement of an infinite number of points over the lease area. The monitoring shall be an extension of the baseline data and shall be conducted by a method approved by the Regional Director in consultation with and concurrence by the Authorized Officer, Surface Management Agency, and District Mining Supervisor.



13. Except at specifically approved locations, underground mining operations shall be conducted in such a manner so as to prevent surface subsidence that would (1) cause the creation of hazardous conditions such as potential escarpment failure and landslides, (2) cause damage to surface structures, and (3) damage or alter the flow of perennial streams. The Lessee, in his mining plan, shall provide specific measures for the protection of escarpments. The Regional Director in consultation with and concurrence of the District Mining Supervisor and Authorized Officer, Surface Management Agency, shall approve such measures and may prescribe any additional measures to be employed such as mining methods, specify the amount of coal recovered, and determine any corrective measures considered necessary to assure that escarpment failure does not occur or that hazardous conditions are not created.
16. The Lessee shall reclaim all areas disturbed as a result of mining and exploration operations to a land use capable of supporting the pre-mining levels of livestock grazing, big game winter range, and other wildlife habitat.

U-28297

4. The Lessee shall conduct his mining and exploration operations in such a manner as to minimize, as practical, the effects on water flow or the availability of waters for surface use. Loss of water due to the Lessee's operations shall be prevented, replaced, or the situation corrected to the satisfaction of the authorized officer and Area Mining Supervisor. The Lessee shall assume full responsibility and liability for damages due to the loss of surface waters resulting from the mining or other operations conducted under this lease.
5. The Lessee shall perform an adequate hydrologic study to secure baseline data concerning the surface and subsurface water occurring on or flowing through the lease area. The results of the study shall be furnished to the Area Mining Supervisor prior to approval of the mining plan. The study shall provide such data and information as considered necessary by the Mining Supervisor and authorized officer.
6. The Lessee will be required to establish a surface subsidence monitoring system to measure the effects of the underground mining activities on the land surface. A satisfactory series of monitoring points shall be established on the lease area. The monitoring shall be conducted by a method and in a manner approved by the Area Mining Supervisor. The results of the monitoring shall be reported periodically to the Mining Supervisor and authorized officer. The Area Mining Supervisor in consultation with the authorized officer, may require the lessee to employ such measures and precautions deemed necessary, including mining methods and extent and manner of coal extractions to assure that neither damage to man made structures nor loss of perennial streams occurs, nor hazardous conditions are created.

The special stipulations are self explanatory and adequately address our concerns. If there are any questions concerning the interpretation of the stipulations, please contact us.

Sincerely,

A handwritten signature in cursive script that reads "W. T. Bailey". The signature is written in black ink and has a long, sweeping tail that extends to the right.

for  
REED C. CHRISTENSEN  
Forest Supervisor