orig Mine file
cc L. Braxton
copy for S. Linney

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United States
Department of
Agriculture

Forest
Service

Manti-LaSal
National Forest

599 West Price River Dr.
Price, Utah 84501

ACT/041/002

Reply to: 2820

Date: October 14, 1986

Richard Holbrook
OSM - Reclamation and Enforcement
Brooks Towers
1020 15th Street
Denver, Colorado 80202

RECEIVED
OCT 16 1986
DIVISION OF
OIL, GAS & MINING

Dear Mr. Holbrook:

In our letter to Ron Naten, dated July 23, 1986, we stated that three concerns needed to be resolved before the Manti-LaSal National Forest would consent to approval of Southern Utah Fuel Company's (SUFCO) Convulsion Canyon Mining and Reclamation Plan. The concerns are as follows:

1. The integrity of Quitchupah Creek must be maintained downstream from the private property where undermining of the creek has taken place.

2. The escarpments of Quitchupah Creek must be protected from subsidence or failure.

3. Southern Utah Fuel Company must establish a subsidence monitoring plan that meets the needs of the Forest Service and the intent of the regulations.

Please refer to our letter addressed to Meg Estep, dated September 9, 1986, which was in response to SUFCO's PAP modification, dated June 23, 1986, regarding subsidence control and monitoring. In this letter, we consented to the subsidence control and monitoring plan (items 2 and 3) subject to several conditions which were discussed. This left item 1 yet to be resolved.

THE PAP modification discusses that a "buffer Zone," provided by support pillars will ensure that the flow in Quitchupah Creek will not be disrupted. After consulting with the BLM and SUFCO, we feel that the "buffer zone" may protect Quitchupah Creek for the life of the mine and for some undetermined time after the mine is closed. We are, however, concerned about long-term subsidence and related effects after mining is completed and the workings are abandoned.

Some unexpected subsidence has already occurred under the west escarpment of Quitchupah Canyon in the "No Subsidence Zone" which, according to SUFCO, is due to water seepage into the mine and collapsing of the support pillars. This indicates to us that there is potential for this to also occur under the creek.

Positive measures must be planned to provide for adequate continuous support under Quitchupah Creek to prevent significant subsidence in the long-term after the mine is abandoned.

If you have any questions, please let us know.

Sincerely,

/s/ William H. Boley

for
REED C. CHRISTENSEN
Forest Supervisor

cc:
Dr. Nielson (Utah Division of Oil, Gas and Mining
K. Frame (SUFCO)
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