



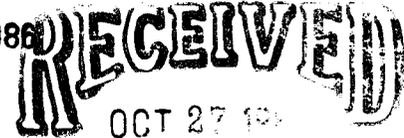
United States Department of the Interior  
 OFFICE OF SURFACE MINING  
 Reclamation and Enforcement  
 BROOKS TOWERS  
 1020 15TH STREET  
 DENVER, COLORADO 80202

*orig mine file  
 cc K. May  
 L. Proxton*

*ACT/041/002*

Dr. Dianne Nielson, Director  
 Utah Division of Oil, Gas and Mining  
 355 West North Temple  
 3 Triad Center, Suite 350  
 Salt Lake City, Utah 84180-1203

OCT 24 1986



DIVISION OF  
 OIL, GAS & MINING

Dear Dr. Nielson:

The Office of Surface Mining Reclamation and Enforcement (OSMRE), Western Field Operations, has received the enclosed letter from the U.S. Forest Service, Manti-LaSal National Forest, concerning the mining and reclamation plan for the Convulsion Canyon mine. The Forest Service does not feel that their concern about potential subsidence occurring beneath Quitchupah Creek in the long-term has been adequately addressed. Therefore, Southern Utah Fuel Company, needs to submit a plan showing positive measures to provide for adequate continuous support under Quitchupah Creek to prevent significant subsidence in the long-term.

Please keep OSMRE informed as to the resolution of the Forest Service's concerns. If you have any questions, please call Meg Estep-Johnston or Rick Holbrook at (303) 844-2451.

Sincerely,

*for* *Ranvir Singh*  
 Melvin L. Shilling, Chief  
 Division of Federal Programs  
 Western Field Operations

Enclosure

United States  
Department of  
Agriculture

Forest  
Service

Manti-LaSal  
National Forest

OSM-117/C  
1986 OCT 14 8 50 AM 7:30  
599 West Price River Dr.  
Price, Utah 84501  
SOUTHERN UTAH FUEL COMPANY  
SOUTHERN TECHNICAL CENTER

Reply to: 2820

Date: October 14, 1986

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

RECEIVED  
OCT 27 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,

A handwritten signature in cursive script that reads "W. B. Bailey". The signature is written in dark ink and is positioned above the typed name.

for  
REED C. CHRISTENSEN  
Forest Supervisor