

United States
Department of
Agriculture

Forest
Service

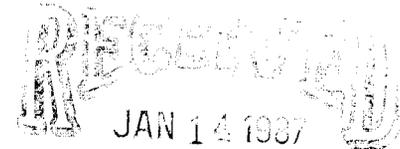
Manti-LaSal
National Forest

599 West Price River Drive
Price, Utah 84501

Reply to: 2820

Date: January 9, 1987

Mr. Lowell Braxton
State of Utah Natural Resources
Division of Oil, Gas and Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203



DIVISION OF
OIL, GAS & MINING

Dear Mr. Braxton:

RE: Convulsion Canyon Mine

We have reviewed Southern Utah Fuel Company's (SUFCo) response letter, dated November 11, 1986, which addresses our concern regarding possible subsidence under Quitchupah Creek.

Our concern is generally for protection of the integrity of Quitchupah Creek in the long run after the mine is abandoned.

The surface and underground subsidence monitoring should be adequate to indicate if the area above the access entries experiences subsidence in the short term during operations, and sometime thereafter. We have no problems with the subsidence and water flow monitoring programs for this area as proposed in the letter.

SUFCo states that prior to abandonment of the access entries which cross under Quitchupah Creek, they will submit a plan for measures to be taken to insure the integrity of Quitchupah Creek. Since technology is rapidly advancing, SUFCo's reply also states that the plan will utilize the best feasible technology.

Since the access entries have already been constructed and are in use, we agree with this approach for mitigating our long-term concern. In the event that subsidence occurs under Quitchupah Creek during the life of the mine, appropriate measures must also be taken, in the interim, to mitigate adverse effects.

The Mine and Reclamation Plan (M&RP) must be amended to address the possibility of subsidence and related effects to Quitchupah Creek, and include the provisions discussed in SUFCo's letter. It must also be stated that a plan for mitigation of adverse effects to Quitchupah Creek will be submitted for approval in the event that subsidence and related effects to Quitchupah Creek occur during the life of the mining operation.

The Manti-LaSal National Forest's consent for approval of the M&RP is contingent upon including this information.

Sincerely,

A handwritten signature in cursive script, appearing to read "Reed C. Christensen".

for
REED C. CHRISTENSEN
Forest Supervisor