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United States
Department of
Agriculture

Forest
Service

Manti-LaSal
National Forest

599 West Price River Dr.
Price, Utah 84501

Reply to: 2820

Date: March 30, 1988

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

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DIVISION OF
OIL, GAS & MINING

Dear Lowell:

We have reviewed Response to Condition USFS, Southern Utah Fuel Co., Convulsion Canyon Mine, ACT/041/002, Folder #2, Sevier County, Utah.

In the response, Southern Utah Fuel Company (SUFCO) states that mining under Quitchupah Creek will be done in such a manner as to leave adequate support pillars such that the perennial stream will not be disrupted.

As stated in our responses on the Five-Year Permit Renewal, we are concerned about the long-term integrity of the creek after the mine is abandoned. In SUFCO's November 11, 1986, letter to your office, in the last paragraph, it is stated:

"Before the area is abandoned, a plan will be submitted to the regulatory authority for approval. This plan will utilize the best feasible technology to provide for maintaining the integrity of Quitchupah Creek."

This statement needs to be made in the Mine Plan.

In addition to this statement, SUFCO must also make a commitment to provide a plan for mitigating the effects to Quitchupah Creek in the event that the flow in Quitchupah Creek is adversely affected by subsidence and surface cracks during the life of the operation. This plan, as well as the plan discussed in the paragraph above, will be subject to approval of the regulatory authority and the Forest Service. The response does not discuss such a plan.

In our review of the response, an inconsistency between Map 80-10B in the Mine Plan and the 1987 subsidence maps included in the 1987 subsidence report was discovered. The subsidence maps have correctly identified the east escarpment area of Quitchupah Canyon as a non-subsidence area. Map 80-10B needs to be corrected.

If you have any questions, please contact the Supervisor's Office in Price, Utah.

Sincerely,

A handwritten signature in cursive script, appearing to read "G. A. Morris".

Sr GEORGE A. MORRIS
Forest Supervisor