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United States
Department of
Agriculture

Forest
Service

Manti-LaSal
National Forest

599 West Price River Dr.
Price, Utah 84501

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Reply to: 2820

Date: September 1, 1989

Richard V. Smith, Permit Supervisor
Utah 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

RE: Quitchupah Lease Addition, Lease U-63214, Permit Application Package (PAP), Southern Utah Fuel Company, Convulsion Canyon Mine, ACT/041/002 - Forest Service Review as the Federal Land Management Agency under 30 CFR Subchapter D

Dear Mr. Smith,

The Manti-LaSal and Fishlake National Forests have jointly reviewed the mine plan for completeness and technical adequacy. It is consistent with the Fishlake and Manti-LaSal National Forest Management Plans.

In subchapter 6.2 of the PAP, SUFCO proposes to conduct an onsite survey to reconcile differences in reported spring locations. When this work is completed the updated hydrologic map must be submitted to the Forest Service for concurrence on the location of Forest Service springs to be monitored.

The provisions for hydrologic monitoring in subchapter 6.4 of the PAP are not sufficient. Lease stipulation 11 requires SUFCO to establish a monitoring system to locate, measure, and quantify the progressive and final effects of underground mining on topography, hydrology, and vegetation. To adequately accomplish this, the PAP or separate monitoring plan must incorporate the following provisions:

Copies of any physical or chemical data pertaining to surface water and/or springs must be sent to the Manti-LaSal and Fishlake National Forests. The flow monitoring system must describe monitoring frequency, measurement techniques, and method of reporting. At a minimum, monthly flow during grazing season (June through September) must be monitored. All data collected must be sent to the Manti-LaSal National Forest and may be presented in an annual report.

SUFCO proposes to drive entries under perennial streams at three locations shown on Map 4.1. Lease stipulation 13 requires that the flow of perennial streams not be altered or damaged by mining induced subsidence. In subchapter 2.0, SUFCO only states that mining activities within the protective stream buffer will be designed using the best feasible technology to protect Quitchupah Creek and the stream in Box Canyon from subsidence. To comply with lease stipulation 13, SUFCO must provide assurance, through adequate geotechnical analysis of the materials and mining methods involved, that these streams will not be subsided. The Forest Service will consent only to development of mains within protection stream buffers after SUFCO agrees to utilize best available technology to prevent subsidence including any that may occur after the mine has been abandoned.

Lease stipulation 13 also requires that escarpment failure be prevented at approved locations, and requires the lessee to provide specific measures to assure protection of escarpments. Map 4.1 of the PAP shows mining of some areas beyond the escarpment without specifying mining method. We are particularly concerned with the threat to eagle nests from potential escarpment failure in the W1/2 Section 20, T21S, R5E; see in Appendix 1 of the PAP - Environmental Assessment for Lease Application U-63214 Quitchupah Tract, Map 2, Golden Eagle Nest Locations. We require that the mining method for areas beyond the escarpment be specified and we require assurance through adequate geotechnical analysis that mining induced escarpment will not occur.

Revisions as noted above must be made before the PAP can be considered consistent with the stipulations contained in Lease U-63214. We will consent only after we determine the changes to be acceptable.

Sincerely,



for
GEORGE A. MORRIS
Forest Supervisor

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