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United States
Department of
Agriculture

Forest
Service

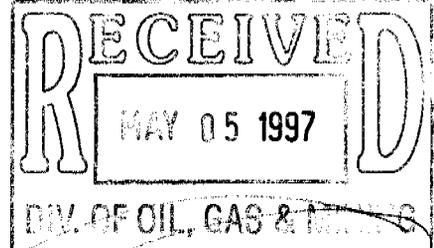
Manti-La Sal
National Forest

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Price, Utah 84501
Phone # (801) 637-2817
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File Code: 2820-4

Date: April 29, 1997

Utah Division of Oil, Gas and Mining
ATTN: Joe Helfrich
1594 West North Temple, Suite 1210
Box 145801
Salt Lake City, Utah 84114-5801



Re: Chapter 7 Revision, Canyon Fuel Company, LLC, SUFCO Mine, ACT/041/002-97A,
File #2, Sevier County, Utah

Dear Joe:

*Copy Joe and Aaron
Fax Petala*
#2
PFO

We have reviewed the revision of Chapter 7, and the associated Appendices, of the SUFCO Mine MRP. The following items of concern to the Forest Service must be addressed by SUFCO.

- 1. Page 7-4, Table 7-1. Observation well completion summary.

A schematic cross section showing the completion depths of the wells listed and formations monitored would be useful in conjunction with this table.

- 2. Page 7-10, 7.2.4.1 Groundwater Information, second paragraph.

They reference a recharge rate of 3 to 8 percent that contradicts what the 1.2 percent rate stated on page 7-5. Please clarify which is the correct rate.

- 3. Page 7-34, Item 3.

Reference is made to an increase in saturated thickness of the Blackhawk. This should be further discussed to establish extent and location, as throughout the document, the Blackhawk is described as not being uniformly saturated.

- 4. Page 7-36, second paragraph.

Mention is made of subsidence cracks healing rapidly. However, where the Castlegate sandstone outcrops on the surface, cracks are not healing. Discussion on cracking of the Castlegate needs to be included.

5. Page 7-38, 7.3.1.1 Hydrologic Balance Protection, Groundwater Protection.

The last sentence, "SUFCO commits to replace the water rights of the U.S.F.S. if any water sources with water rights are impacted by mining at the SUFCO mine," is not acceptable. Forest Service Stipulation #17, which is a part of SUFCO's leases, states "The Lessees, at their expense, will be responsible to replace any surface water identified for protection, that may be lost or adversely affected by mining operations, with water from an alternate source in sufficient quantity and quality to maintain existing riparian habitat, fishery habitat, livestock and wildlife use, or other land uses." Water replacement is not restricted to waters on which the Forest Service holds water rights.

6. Page 7-45, Table 7-4.

Boron and selenium are known to occur in the coal strata in the area, and are tested for at the waste rock site. If it is not already required, these elements should also be tested for in wells at the waste rock site.

7. Page 7-48, second paragraph.

SUFCO states that, "where feasible," they will remove or properly abandon "equipment, structures and other devices used in conjunction with monitoring the quality and quantity of groundwater." This is required by Forest Service Stipulation #15, so the statement "where feasible" must be eliminated.

8. Page 41, Appendix 7-17, 6.1.5.4 Summary of lower Blackhawk Formation Groundwaters.

The text is describing the upper Blackhawk Formation. This section should be corrected.

9. Page 51, Appendix 7-17, last paragraph.

The data from the monitoring wells seems too variable to make the general statement that "dewatering effects seen in the lower Blackhawk have a limited temporal duration." This conclusion should be refined.

10. Page 53, Appendix 7-17, Conclusion #11.

Same as Item #9 above.

11. Page 72, Appendix 7-17, Table 9.

Boron and selenium should be added to the list for ground water quality monitoring (see Item #6 above).

Mr. Joe Helfrich

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Please contact Liane Mattson or Dale Harber at (801) 637-2817 if you have any questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "Janette S. Kaiser".

for
JANETTE S. KAISER
Forest Supervisor

cc: Fishlake National Forest
Bureau of Land Management, Price UT
Price Ranger District
Ferron Ranger District