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State of Utah  
DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF OIL, GAS AND MINING

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November 9, 1998

Janette S. Kaiser, Forest Supervisor  
Manti-LaSal National Forest  
599 West Price River Drive  
Price, UT 84501

Re: Pines Tract Project DEIS Comments, Canyon Fuel Company, LLC, SUFCO Mine, ACT/041/002, File #3, Sevier County, Utah

Dear Ms. Kaiser:

The Division of Oil, Gas and Mining (Division) respectfully submits the following comment on the Pines Tract Project DEIS:

The Preferred Alternative identified in the Pines Tract Project DEIS is proposed to be a developed compromise between Alternative C and Alternative D, with the major question still out for a decision, of allowing undermining, and thus subsidence, under Box Canyon. The Division has as part of its mission, the responsibility to regulate the development of coal in conformance with the Utah Code and the federal Surface Mining Control and Reclamation Act in a manner which supports the existence of a viable coal mining industry and yet also safeguards the environment and protects the public health and safety. To meet the challenge of this mission, the Division has historically supported the development of solid scientific data upon which to make future decisions. To this specific end, the Division has supported or encouraged studies to evaluate the effects of mining in both Burnout Canyons and the North Fork of Miller Canyon on the Wasatch Plateau. In March of this year at a meeting of the regulatory agencies with the Utah Coal Operators, the Division strongly encouraged the review of the data and geology which was collected from these studies, and from other studies beyond the Wasatch Plateau, for the very purpose of aiding in decisions such as these.

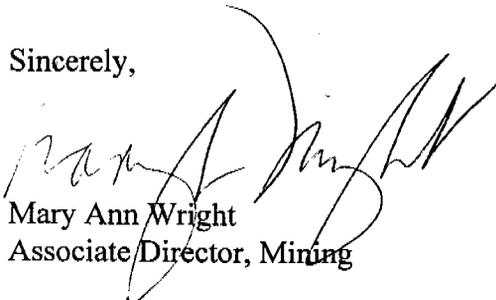
At this time, the Division believes that sufficient information and studies do already exist on subsidence in relation to undermining perennial streams to support a strong case for selected undermining of the Box Canyon area. Experience from mining in the Wasatch Plateau and elsewhere in other coal regions has indicated both the geologic

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conditions and the cover levels that can withstand full coal extraction without undue damage to the environment. Thus, the Division strongly encourages the Forest Service, in conjunction with the Bureau of Land Management, to rely strongly on this existing data to specify the elimination from full extraction, some subsidence-sensitive areas, and yet to maximize coal recovery from this lease tract. The Division believes that basing decisions upon reliable science is a sound practice and should be implemented.

Thank you for the opportunity to comment on this draft.

Sincerely,



Mary Ann Wright  
Associate Director, Mining

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