

**File Code:** 2820  
**Date:** March 9, 2017

Daron Haddock  
Coal Program Manager  
Division of Oil, Gas & Mining  
1594 West North Temple  
Suite 1210  
Salt Lake City, Utah 84114-5801

RECEIVED  
MAR 13 2017  
DIV. OF OIL, GAS & MINING

Dear Mr. Haddock:

The Manti-La Sal National Forest (FS) has completed review of the Permit Application Package (PAP) for permit C/041/0002, Task #5360 that you provided to us on January 25, 2017 for the proposed mine plan change on the Quitchupah Tract at SUFCO Mine for coal leases U-63214, U-62453 and U-28297. The FS is responding as the Federal land management agency according to 30 CFR 944.30, Article VI (C)(2).

With respect to post-mining land use, according to the Manti-La Sal Forest Plan (1986), the surface lands within the project area are managed for wood-fiber production and harvest above the Castlegate Sandstone escarpment and general big-game winter range on the slopes below the escarpment. Any surface disturbance and subsequent reclamation must be designed to support these post-mining land uses.

With respect to protection of non-mineral resources, the FS finds the proposed resource monitoring plan generally adequate. However, the FS finds the PAP deficient in certain information that is needed to assess protection of non-mineral resources. To that end, further clarification and inclusion of the following information is needed before the FS can complete its review as described below:

- 1) Special Coal Lease Stipulation #1 states that a cultural resource inventory and a paleontological appraisal of the areas to be disturbed may be required prior to undertaking activities that may disturb the surface of previously undisturbed leased lands. The predicted subsidence zone has not been previously surveyed for cultural and paleontological resources. The FS has reviewed prior archaeological surveys completed in the Quitchupah Tract and has identified that archaeological surveys and clearances are required in the permit revision area.
- 2) Updated geological information is needed to better understand the potential consequences of subsidence on non-mineral resources. The FS requests the following:



- A geology map superimposed over the proposed mine plan. In particular, the FS finds that the geology information provided in the PAP appears to describe the geology for the Muddy Tract area, rather than the Quitcupah area. We request this information be reviewed and clarified.
  - An overburden map with updated information superimposed over the proposed mine plan. Of note, the FS has information to indicate the overburden in the area ranges from approximately 300 to 930 feet, whereas the PAP indicates overburden ranges from 1,000 to over 2,200 feet. The FS requests clarification of the overburden present in the PAP area.
  - A subsidence contour map with updated information superimposed over the proposed mine plan.
  - North-south and east-west cross-sections showing the location of the proposed longwall panel within the coal seam.
  - A topographic map of the project area.
- 3) Description of potential for escarpment failure as a consequence of subsidence. As noted in the PAP, Golden eagle nests are present along the Castlegate Sandstone escarpment in Dry Fork Canyon. The FS requests additional information regarding the risks to the nests along with mitigation plans and requests to be included in nest mitigation discussions.
- 4) Description of effects to hydrologic resources in the permit revision area resulting from subsidence. The ground surface and escarpment within the predicted subsidence zone are mapped as Castlegate Sandstone, known for its brittle behavior (as noted in the PAP) when subjected to subsidence stresses. Surface water flow contributes to annual water needs of vegetation in the subsidence zone. Subsidence/surface cracks disturb overland flow, thereby further stressing the vegetation.
- 5) Description of potential effects to, and plans to monitor the Ponderosa Pine, Pinyon/Juniper vegetation communities and a description of reclamation measures to reestablish the health of the Ponderosa Pines and other vegetation should they be damaged by subsidence.

With respect to other conditions on lands within FS jurisdiction, approximately 59 acres of the PAP area lies within priority Greater Sage-grouse habitat (see attached map) located above the Castlegate Sandstone escarpment. The FS September 2015 Greater Sage-grouse Record of Decision for Idaho and Southwest Montana, Nevada and Utah, amended FS land management plans for sage-grouse management, including the Manti-La Sal Forest Plan. The amendment includes the following standard for leased coal mines (GRSG-M-CML-ST-093):

“In priority habitat management areas and sagebrush focal areas do not authorize new appurtenant surface facilities related to existing underground mines unless no technically feasible alternative exists. If new appurtenant surface facilities associated with existing mine leases cannot be located outside of priority habitat management areas

and sagebrush focal areas, locate them within any existing disturbed areas, if possible. If location within an existing disturbed area is not possible, then construct new facilities to minimize disturbed areas while meeting mine safety standards and requirements as identified by the Mine Safety and Health Administration mine-plan approval process and locate the facilities in an area least harmful to greater sage-grouse habitat based on vegetation, topography, or other habitat features...”

To implement this standard, the FS requires that the following condition be included in the permit modification/revision approval:

*To protect sage-grouse habitat, locate new appurtenant surface facilities outside priority habitat management areas, unless no technically feasible alternative exists. If new appurtenant surface facilities cannot be located outside of priority habitat management areas, locate them within any existing disturbed areas, if possible. If location within an existing disturbed area is not possible, then construct new facilities to minimize disturbed areas while meeting mine safety standards and requirements in the established mine-plan approval process and locate the facilities in an area least harmful to greater sage-grouse habitat based on vegetation, topography, or other habitat features.*

The FS will complete its review once additional information and clarifications are received. If you have any questions or need clarification on anything please contact Jeff Salow, Tel.# (435) 636-3596, e-mail: [jsalow@fs.fed.us](mailto:jsalow@fs.fed.us) or Karl Boyer, Tel.# (435) 636- 3551, e-mail: [kboyer@fs.fed.us](mailto:kboyer@fs.fed.us).

Sincerely,



BRIAN M. PENTECOST  
Forest Supervisor

cc: Nicole Caveny (OSMRE), Becky Hammond (FS)

# SUFCO Quitchupah Tract

3 Right 4 East Longwall Panel  
T21S R5E



 Sagegrouse Impact Area (59 acres)

 Subsidence Impact Area (109 acres)

