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State of Utah

DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER
Executive Director

Division of Oil, Gas and Mining

JOHN R. BAZA
Division Director

April 16, 2013

Mr. Ray Petersen, Emery County Public Lands Council
P. O. Box 1298
Castle Dale, Utah 84513

Dear Mr. Petersen:

Thank you for providing feedback to us during our recent outreach efforts. The input we received from you and others will help us improve our program and be more responsive to the needs of the citizens of Utah. This letter is intended as a response and to let you know that the Division and OSM have considered your comments while we are developing our action plans for the upcoming evaluation year.

You have expressed concerns about monitoring and protection of water resources in the Emery County area. We understand and share your concerns. You suggest that data be collected sufficient to determine normal flow, seasonal variation and high/low water year variation. You would also like to have data gathered over a time period sufficient to establish a realistic baseline. You might already know that the Division requires mines to conduct a fairly rigorous and ongoing water monitoring program that looks at both surface and groundwater. The collection of baseline data is also a requirement of our program. We have an extensive database that logs the information that we are receiving. You suggest that we encourage other agencies and stockholders to participate in the monitoring and we would be happy to include their data into our hydrologic assessments. The development of a Cumulative Hydrologic Impact assessment (CHIA) for the major watersheds is a big part of our program. We are continually trying to improve our analyses and your suggestions will be factored into the CHIA that we will be developing for the Green's Hollow tract.

You also expressed the need to identify trigger points that would initiate specific predetermined actions. We do have water replacement rules in place that require replacement of water that has been adversely impacted by mining activities (see R645-301-731.800). We are certainly open to having a dialogue regarding the mitigation options and recognize the need to include other agencies, the mines, cattlemen, and other citizens in the discussions. Moreover, the Division and OSM plan to conduct an in-depth technical review during this coming year to investigate the Division's review and implementation of the SUFCO mine's water monitoring program.



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With regard to your comments associated with the SUFCO mine, the Bureau of Land Management is currently producing an Environmental Impact Statement that should address the impacts associated with water resources in the Green's Hollow tract. Once a draft of the EIS is released the public will have the opportunity to comment and provide input to that process. We encourage you to participate by providing comments to the BLM at that time. Of course there will be additional opportunities to provide input for any future permitting action should a lease be issued and a permit applied for.

We hope this information is helpful to you. We appreciate your willingness to provide input to our Evaluation Process.

Sincerely,



Daron R. Haddock
Coal Program Manager

DRH/ss
cc: Howard Strand, OSM
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