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SCOTT M. MATHESON  
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OIL, GAS, AND MINING BOARD

GORDON E. HARMSTON  
Executive Director,  
NATURAL RESOURCES

STATE OF UTAH  
DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF OIL, GAS, AND MINING  
1588 West North Temple  
Salt Lake City, Utah 84116  
(801) 533-5771

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CLEON B. FEIGHT  
Director

June 5, 1979

Mr. Richard B. White  
Hydrologist  
Vauhgn Hansen Associates  
Waterbury Plaza  
5620 South 1475 East  
Salt Lake City, Utah

RE: Hydrologic and Subsidence Studies  
for Valley Camp of Utah  
Belina Mine  
Carbon County, Utah  
ACT/007/001

Dear Rich:

The Division would like to offer the following comments on Vaughn Hansen Associates reports for Valley Camp of Utah:

Hydrologic Inventory and Monitoring Plan

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1.	3	The use of paramenters having insignificant concentrations may be beneficial as indicators. The Division feels that to drop a parameter from the list there should be data showing a fairly constant concentration at an acceptable level.
2.	6	The use of methodologies to estimate sediment yield is a good idea. The Division would like to see some checks on the results by actual measurements of the sediment yield.

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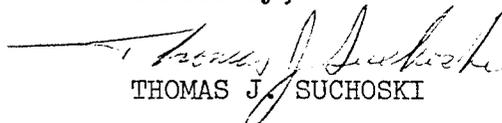
<u>Comment No.</u>	<u>Page</u>	<u>Comment</u>
3.	8	The Division cannot justify a surface water sampling frequency of every two months, without the data to backup this conclusion. Unless a Division review of the data show that this is acceptable, the Division will require monthly sampling.
4.	8	Frequency for sampling of representative springs and wells may need to be increased depending on the location and quality data of these sites.
5.	10	The Division would request the addition of Dissolved Iron sampled twice per month to the parameter sampled from mine water discharge.
6.		The Division would encourage the use of the ideas presented in the proposed guidelines for surface and groundwater monitoring (i.e., Annual Complete Water Quality Analysis).

Subsidence Monitoring Plan

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1.	1	Subsidence monitoring programs may be required. This will be determined by the regulatory authority. The reference for this requirement is Section 30 CFR 784.20 of the permanent program.
2.		The plan that is proposed seems to be adequate. The Division recommends that this plan be included in the application for the permanent program.

If you have any questions about these comments, please do not hesitate to call me.

Sincerely,

  
THOMAS J. SUCHOSKI

TJS/te

cc: Valley Camp of Utah, Trevor Whiteside