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United States Department of the Interior
OFFICE OF SURFACE MINING
Reclamation and Enforcement
BROOKS TOWERS
1020 15TH STREET
DENVER, COLORADO 80202

OFFICE OF THE REGIONAL DIRECTOR

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DIVISION OF
OIL, GAS & MINING

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Mr. Ron Daniels
Coordinator of Mined Land Development
Utah Department of Natural Resources
Division of Oil, Gas and Mining
1588 West North Temple
Salt Lake City, Utah 84116

Dear Ron:

This office has reviewed Valley Camp Coal Company's plan for hydrologic and subsidence monitoring. The plans were submitted in correspondence from Mr. Suchoski, of your office, dated November 5, 1979. After consultation with the U.S. Geological Survey and the U.S. Forest Service, we give our approval to both monitoring plans provided that the concerns and stipulations noted below are met.

The subsidence monitoring plan includes an initial, low altitude, color aerial photography of the proposed mine area. The initial aerial photography flight was conducted in September, 1979. Baseline data should be made available for review and comment by both the Forest Service and OSM. After evaluating the data, this office may require additional on the ground measurements of the surface area where the panels are to be mined in the spring of 1980.

Much of the discussion on the water monitoring plan is at a conceptual stage, and as such, the plan lacks sufficient detail to evaluate the effectiveness of the monitoring. It is understood that the objective of this plan is to enlarge the existing hydrologic monitoring plan in order to accommodate expanding mining activities. We recognize that this inventory is a continuing process and that all data will not be collected prior to approval of this plan. However, the plan leaves it at the discretion of the applicant to choose which springs, seeps, and ponds that will be sampled and when these sites will be discontinued from the monitoring program. More control as to the quality of the monitoring program is required. Therefore, the following stipulations are attached to the approval of the water monitoring system:

1) The baseline data inventory must be made available to the regulatory agencies for review and comment. During this review, both surface and ground water sampling sites will be evaluated to determine whether an effective water monitoring plan has been established. Final locations and procedures will be submitted for approval by the regulatory authorities.

Maps must be provided that show all available information as to geology, seep, spring and stream location as well as the proposed ground water monitoring stations. Many of the springs and seeps will not be used in the monitoring program but have been located in the field. All springs and seeps found in the area must be located on the maps; however, springs and seeps proposed for the monitoring program must be designated as such.

Mr. Daniels

-2-

In addition we are concerned about how the data will be displayed. A significant part of the requirement of a monitoring plan are the requirements for displaying of the data, both the inventory data and the monitoring data. Appropriate data displays, such as maps, charts, tables, overlays and narrative descriptions are essential to the success of the program. Data collected and filed are of no value and often cannot be later evaluated unless properly recorded and documented. All maps (both surface and subsurface) should be on the same scale so they can be superimposed one upon the other. Maps, as now presented, are not of a scale suitable for presentation and evaluation of the data;

2) For the first two years, quarterly water quality samples and monthly water well levels will be taken, where possible;

3) Changes in the water monitoring program must be approved by the regulatory agencies. This will include, but not limited to, changes in monitoring site location and changes in parameters that are to be analyzed;

4) Annual summaries will be presented to the regulatory agencies for their review;

5) Valley Camp Coal Company must make a commitment to maintain the sampling sites as well as to have qualified persons taking samples; and

6) The Forest Service monitoring plan guide specifies that the requirements for monitoring and the designation of points to be monitored will be done using the baseline inventory data, and will be by coordination of the operator, Forest Service, USGS, and OSM. We feel that it is essential for the regulatory authorities to meet with Valley Camp and review their inventory data.

A copy of this letter is enclosed for transmittal to the applicant by your office. If you have any questions with regard to this review, please contact John Nadolski of my staff (303-837-3773).

Sincerely,



DONALD A. CRANE

cc: Feldmiller, USGS, Denver
Moffitt, USGS, Salt Lake City
Christensen, Manti LaSal National Forest
Johnson, Forest Service