

0006

Tom
Files 11/29/79

BRAZTAH CORPORATION

10880 WILSHIRE BOULEVARD, SUITE 1500 (213) 879-5252
LOS ANGELES, CALIFORNIA 90024

October 19, 1979

Department of Natural Resources
State of Utah
Division of Oil, Gas, and Mining
1588 West North Temple
Salt Lake City, Utah 84116



Gentlemen:

Re: Braztah Corporation Surface and Groundwater
Monitoring Plans
State Permit # ACT/007/084

Attached please find Braztah Corporation's ("Braztah") Surface and Groundwater Monitoring Plans.

Although said Plans are filed at this time for approval pursuant to the OSM-Notice of Violations (79-5-5-30; 79-5-5-31; 79-5-5-32; and 79-5-5-33) and the State of Utah Notice of Violations, plans substantially in the same form were submitted to the United States Geological Survey in November of 1977 in accordance with 30CFR211 as an appendix to Braztah's Mining and Reclamation Plan. (A copy of the November 1977 submittal is attached for your information.)

Braztah implemented its Surfacewater and Groundwater Monitoring Plan in 1977 and will continue to monitor surfacewater and groundwater in accordance with the new Plans submitted herewith.

Should you have any questions regarding this matter, please do not hesitate to contact either K. B. Hutchinson, Chief Engineer or the undersigned.

Very truly yours,

BRAZTAH CORPORATION

A handwritten signature in cursive script that reads "Howard J. Bressler".

Howard J. Bressler
Vice President
Assistant General Counsel

HJB/rsh
cc:

Murray T. Smith
Chief
Division of Inspection
and Enforcement
Office of Surface Mining
Post Office Building Room 270
1823 Stout Street
Denver, Colorado

GROUNDWATER MONITORING PLAN

BRAZTAH CORPORATION

PREFACE

The following groundwater monitoring plan has been developed to provide an ongoing assessment of the possible impact of the Braztah Corporation's mining activity on the groundwater regime within its mine plan area. This plan utilizes both wells and natural springs as sampling sites.

The plan has developed over a period of several years and presently includes nine (9) separate sampling locations. Additional monitoring facilities will be installed at least nine (9) months in advance of future mine development in areas not presently served by existing monitoring facilities. Braztah Corporation will secure Regulatory Authority concurrence of these additional facilities prior to their installation.

Monitoring, to date, has been confined to the Blackhawk formation as this is the most critical geologic unit.

SAMPLING and ANALYSIS

Braztah Corporation will collect water samples quarterly at the following stations:

<u>Station</u>	<u>Type of Station</u>	<u>Location</u>
B 22	Spring	Crandall Canyon
BW-23	Well	Middle Bear Canyon
BW-24	Well	Middle Bear Canyon
B-32	Spring	Mathis Canyon
B-33	Spring	Dry Canyon
B-40	Well	Upper Sowbelly Gulch
B-41	Well	Lower Sowbelly Gulch
B-42	Well	Upper Bear Canyon
B-43	Well	Crandall Canyon

The geographic location of these stations is shown in Figure 1.

Water samples and physical measurements will be made quarterly at all stations and will include: (a) the collection of samples and (b) the determination of static level (wells) or discharge (springs).

Measurement and sample collections will be conducted by persons who are properly trained and experienced in such work. All samples for laboratory analysis will be collected in approved containers and properly preserved prior to transportation to the laboratory. The following analyses will be performed on all samples:

- pH
- Total Acidity
- Total Alkalinity
- Total dissolved solids
- Hardness
- Total Iron
- Dissolved Iron
- Total Manganese
- Sulfates

Following receipt of the analytical findings, Braztah Corporation will submit a report, in letter form, to the Regulatory Authority. It is anticipated that such reports will be filed within 45 days following the end of the sampling period. For the purposes of this plan, Braztah Corporation intends to follow the following sampling period designation:

<u>Quarter</u>	<u>Period</u>	<u>Report Filed by</u>
First	Jan. 1 - March 31	May 15
Second	April 1 - June 30	August 15
Third	July 1 - Sept. 30	November 15
Fourth	Oct. 1 - Dec. 31	February 15

To the extent feasible, Braztah Corporation intends to utilize this plan in fulfillment of its obligations under the Permanent

Regulatory Program. Braztah submits that this would provide continuity to the data, and thus, would help alleviate possible confusion to both itself and the Regulatory Authority.

As mentioned previously, Braztah views groundwater monitoring as an ongoing obligation which is reflective of current mine development and agrees to expand this program as necessary to reflect additional mine development.