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STATE OF UTAH
NATURAL RESOURCES
Oil, Gas & Mining

Norman H. Bangerter, Governor
Dee C. Hansen, Executive Director
Dianne R. Nielson, Ph.D., Division Director

355 W. North Temple • 3 Triad Center • Suite 350 • Salt Lake City, UT 84180-1203 • 801-538-5340

April 18, 1985

Mr. Robert L. Wiley
Environmental Engineer
Price River Coal Company
P. O. Box 629
Helper, Utah 84526

Dear Mr. Wiley:

RE: Conditional Approval for MRP Permit Amendment, Annual Report and Request to Amend Water Monitoring Plan, Price River Complex, ACT/007/004, #3 and #9, Carbon County, Utah

As per your conversation with Rick Summers on April 12, 1985, this letter should clarify the concerns you wished to have addressed. This letter includes the minor corrections which you indicated were in error and will serve as an update to the DOGM letter forwarded to you on April 11, 1985. Additionally, formal approval for this permit amendment is hereby granted.

The Division has reviewed Price River Coal Company's February 21, 1985 request to modify the approved water monitoring program and annual report for the Price River Complex. The following comments are forwarded pertinent to this review:

The company's request consists of two parts:

- (1) Reduce the routine monitoring for oil and grease to a biannual time frame.
- (2) Delete sampling points BM-29 and BM-30.

After reviewing the data submitted for 1984 (quarterly sampling), it was shown that all analyses for oil and grease were less than one mg/l. However, several sampling sites have the potential for receiving oil and grease from mine operations. It may be that these contaminants just have not had the time to migrate to the sites. Therefore, it is the Division's opinion that routine sampling for oil and grease should not be deleted from all sampling points.

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Several sampling points can be approved to drop this parameter. Water sampling records to date have not shown problems with oil and grease from certain sites. There is very low probability for future oil and grease contamination from certain monitoring locations (i.e., springs, abandoned mines and streams with undisturbed areas upstream). The following recommendations are provided after reviewing the recent request:

1. After site review of BM-29, it was determined that BM-29 could be dropped from the sampling schedule. This spring issues from the Kenilworth portal and flow is only approximately 0.01 cfs (4.4 gpm). The flow is rapidly infiltrated into the highly permeable soil with in 5-10 feet of the portal. Additionally, this flow is of low quality due to direct contact with the Mancos shale.
2. Site BM-30 should be retained as a sampling site because it collects discharge from three seams that have been worked. The flow is substantial at 14 gpm (1984 mean) with nearly 20 gpm maximum. This flow also collects and discharges directly into the Price River approximately 300-500 feet from the portal.
3. Drop oil and grease from the following sites:

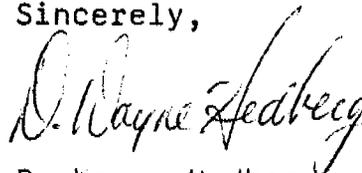
BM-31
BM-32 (spring)
BM-28
B-22 (spring)
B-12.
4. Site B-27 can have oil and grease dropped from the sampling parameter list at the operator's discretion. It is advised that the operator keep this site for his own protection (i.e., this site will monitor any oil and grease that comes into his property to compare with site B-3. If only B-3 is monitored, the operator could be liable for any upstream contamination.

Please provide a response to these review comments by May 1, 1985. Please submit 14 copies of replacement pages reflecting these changes for insertion into the Mining and Reclamation Plan (MRP). These copies will be directed to all appropriate agencies to update their MRP's on file. The Division will finalize this request for change upon receipt of the Company's response.

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Should questions arise, please feel free to call me or Rick Summers of the technical staff. The Division appreciates your patience and cooperation in resolving these remaining concerns.

Sincerely,



D. Wayne Hedberg
Permit Supervisor/
Reclamation Hydrologist

RS/btb

cc: Allen Klein
Mark Humphrey
Steve McNeal
Lowell Braxton
Joe Helfrich
Tom Wright
Mary Ann Wright

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