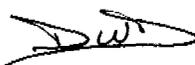


FILE COPY

May 28, 1986

TO: Technical File

FROM: David Darby, Geologist 

RE: Price River Coal Company's Response to Special Permit Condition #6, ACT/007/004, Folder No. 3, Carbon County Utah

Summary:

In Price River Coal Company's (PRCC) Special Permit Condition response dated December 16, 1985, a request was made to the Division to accept the responses as they are addressed and cease making PRCC jump through additional hoops.

In accepting their permit to mine coal PRCC also accepted special conditions outlined by the Division to fulfill mining and reclamation obligations outlined the Decision Document July, 1984. Condition #6 outlines the procedures to implement an in-mine ground water monitoring program (page 34, Decision Document). This information is necessary to determine the effects mining has on aquifers in the vicinity of the mine, and to establish trends in ground water quality and/or production as mining progresses. This condition was established to supplement the paucity of well data and to be consistent in establishing the parameters and characteristics of groundwater and aquifers.

The response submitted by the applicant does not address the information outlined in condition #6. A response needs to be addressed and the data submitted.

The following is a chronology of events and communications concerning Condition #6.

July 1984:

Located in Decision Document (July 1984.) Technical and Environmental Assessment, Page 34, Groundwater monitoring - In-mine flow.

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January 9, 1985 Files:

Letter from OSM to Price River requiring clarification of condition #6.

March 19, 1985:

Stipulations response review. DOGM outlined information and procedures to address in mine monitoring.

July 22, 1985:

Response to Permit conditions. DOGM letter to PRCC reiterating condition #6 as outlined in March 19, 1985 letter.

December 16, 1985:

Price Rivers Response to Conditions. This response does not address the information or data requested.

December 19, 1985:

Hand delivered letter to PRCC. DOGM told PRCC to address Condition #6.

In the cover letter accompanying the response PRCC charges that:

- (1) Parameters change for in mine monitoring when personnel change.
- (2) The parameters for underground monitoring were arrived at after lengthy consultation with our hydrologist s and their consultants.
- (3) The plan has been part into effect, and has been monitored as such for two years.
- (4) Testing or manganses, as requested, is specifically exempt in alkaline waters, which exist at the mine.

- (5) Everyone concerned argued that no useable information would be gained by adding such requests.

In replying to these charges I must state that:

- (1) OSM set up the original in-mine monitoring program. Guidelines to address in-mine monitoring was still being drafted at that time. The Division changed the in-mine monitoring program during their review to be consistent with the in-mine monitoring guidelines that the State had established. In this form, the monitoring plan was adopted by PRCC.
- (2) As stated previously OSM, working with PRCC's consultants, formed the original in-mine monitoring plans. DOGM personnel requested variations in the original monitoring plans to establish consistency with the guidelines established for in-mine monitoring. These changes actually required the operator to spend less time monitoring.

Since acceptance of the conditions no formal meeting or conversations have been conducted between PRCC and DOGM to establish monitoring sites or methods of monitoring.

- (3) The applicant states that the plan has been put into effect for two years, yet no data or reports have been submitted. No contact has taken place with DOGM to show or coordinate monitoring site selection.
- (4) The applicant criticized the testing of manganese. It is Division policy to review analyses and terminate monitoring of elements that are shown to be insignificant. The applicant must first supply the analysis before this determination can be made. Also, this letter is the first communication the applicant has noted information pertaining to Condition #6.

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- (5) The information gained from this data is useful to determine locations, quantity and quality of ground water contacted in the mines. It also can show the relationship ground water movement has with geologic features, and will enable the prediction of ground water contact in future mining areas.

Recommendations:

The applicant should contact Division staff personnel to coordinate an in-mine monitoring site plan.

The applicant should submit current in-mine monitoring plans, reports and data.

The applicant should establish an in-mine ground water monitoring as outlined on page 34 of the Technical and Environmental Assessment section of Price River Coal Company's Mining Plan Decision Document.

cc: L. Braxton
D. Darby
S. Linner
R. Summers
0183R-10