



**CASTLE GATE**  
COAL COMPANY

A Subsidiary of  
AMAX Coal Industries, Inc.

**RECEIVED**  
JUN 20 1989

DIVISION OF  
OIL, GAS & MINING

June 19, 1989

*Lowell*  
*we may want*  
*to initiate a*  
*written denial based*  
*on this. we should*  
*discuss it with James.*

Ms. Susan Linner  
Reclamation Biologist  
Division of Oil, Gas & Mining  
355 West North Temple  
III Triad Center, Suite 350  
Salt Lake City, UT 84180-1203

Re: April 6, 1989, Conditional Approval to Slurry Injection Well

Dear Ms. Linner:

The purpose of this letter is to address the conditions which you attached to the approval of the permit. Castle Gate added additional paragraphs in Section 10.1-1 to address your conditions. The updated material is incorporated into the permit renewal document.

Castle Gate Coal Co. added text in Section 3.10-1 which addressed Condition 1 requirements for parameters, frequency of monitoring and submittal timeframes. Castle Gate also added a written commitment which states that the Division will be notified of changes in the injection fluid or violations of the drinking standards per Condition #2.

Castle Gate Coal cannot agree with the second stipulation in Condition #1 which requires Castle Gate to monitor the coal slurry materials. The section cited as the reason to monitor these materials is for surface refuse piles and not applicable to an injection well. The testing parameters for the coal refuse pile are necessary to ensure that the soil will support revegetation and runoff from the pile will not be a source of toxic pollutants.

*see 8/7/8*

*(1) is there any thing in BWPL's sampling program that get's the same info?*

*(2) what reg #? § 817.98*

rha/0614

*Can reduce frequency*

*(I have committed to do some in School House refuse plan) as per letter*

*curious sent. 8/6/89*

Ms. Susan Linner  
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The opinions of Castle Gate Coal Co. and the Bureau of Water Pollution Control are that the existing monitoring plan adequately protects the groundwater quality. Additional requirements are, therefore unnecessary.

Sincerely,

  
Richard H. Allison, Jr., P.E.  
Project Supervisor

RHA:dbw

cc: Bob Evans  
Steve Youngbauer  
Tom McKenna  
Jim Buck, Indy  
DOGM File  
Chrono

rha/0614