



State of Utah
 DEPARTMENT OF NATURAL RESOURCES
 DIVISION OF OIL, GAS AND MINING

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June 18, 1997

John Pappas, Sr. Environmental Engineer
 AMAX Coal Company
 P.O. Drawer PMC
 Price, Utah 84501

Re: Quality and Consistency of Water Quality Monitoring Reports, AMAX Coal Company, Castle Gate Mine, ACT/007/004, File #2, Carbon County, Utah

Dear Mr. Pappas:

Recent evaluation of quarterly water monitoring reports has revealed quality problems which are re-occurring at your mine. This letter is to inform you of the Coal Regulatory Program's (CRP) expectations regarding the quality and consistency of quarterly water monitoring reports submitted to the Division.

Many quarterly water monitoring reports that we have received have been incomplete, incorrect, or inconsistent and thus, unacceptable. Currently, CRP personnel managing the database spend at least 15 to 20 hours per week attempting to correct, interpret, research and read the results of careless or negligent work. Specific problems are that field data are not always submitted with lab data sheets and incorrect units are specified for various parameters as noted specifically below.

Castle Gate Mine:

- B-5, Price R.:
 Most yrs Unacceptable flow data submittal (flow data is reported as "> 10 CFS").
- B-6, Price R.:
 Most yrs Unacceptable flow data submittal (flow data is reported as "> 10 CFS").
- B-6, Price R.:
 12-07-92 Need field data sheets.

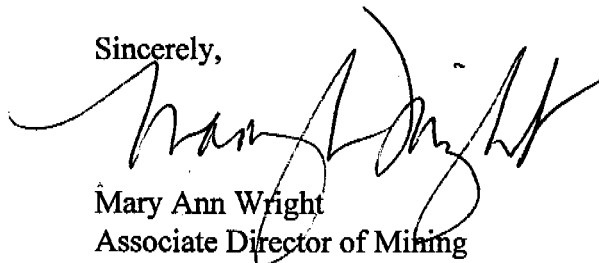
11-29-94 Need field data sheets.
11-27-95 Flow calculation incorrect. The stated measurements and product is "3.0 fps ~30'W x 2.0'D = 2,862.0 GPM". Our calculation of flow using these measurements is a different product:
180 CFS (80,784 GPM).

- B-26, Crandall Cyn Creek:
06-07-95 Unacceptable flow data submittal. Flow data is confusing and possibly calculated wrong based on given stream measurements: "1.3 velocity/2'(Depth) (1.5")(2'W)". The submitted flow value is 109.2 GPM. Our flow value calculated from the given (& interpreted) stream measurements is 172.62 GPM.

Beginning with the next set of water monitoring reports submitted to the CRP by your company which are incomplete or inaccurate, the reports will be rejected as unacceptable and returned to you for correction. We are hopeful that it will not reach a point of continued submittal of erroneous quarterly reports, but if needed, the situation will be interpreted by us as one of noncompliance.

Submission of high quality accurate reports will reflect highly of your company and will allow the Division to maintain its water quality database in a more professional manner. Thank you in advanced for correcting these problems. Please contact me at 801-538-5306, or Ken Wyatt at 801-538-5266 to discuss any questions you may have.

Sincerely,



Mary Ann Wright
Associate Director of Mining