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The Energy People

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007/005 #2

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FEB 26 1993

DIVISION OF  
OIL GAS & MINING

February 25, 1993

Mr. Daron Haddock, Permit Supervisor  
Division of Oil, Gas, and Mining  
355 West North Temple  
3 Triad Center, Suite 350  
Salt Lake City, Utah 84180-1203

Re: M&RP Deficiency Responses

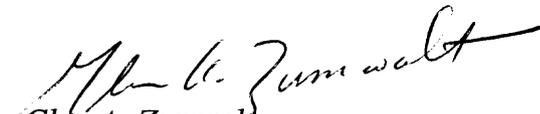
Dear Mr. Haddock,

Your correspondence of December 8, 1992 identified some remaining deficiencies to our M&RP renewal. In our response dated January 26, 1993, most of the remaining items were addressed, however, some responses which additional effort were deferred until March 1, 1993. This submittal addressed those deferred issues.

Also, included is an updated PHC with page notations modified to reduce confusion.

We appreciate your assistance in this renewal effort. If you need additional information please contact Keith Zobell.

Sincerely,

  
Glen A. Zumwalt  
Vice President/General Manager  
Skyline

GAZ:KW:dk

Enclosure

**Utah Fuel Company**

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## TECHNICAL DEFICIENCY REVIEW

### PERMIT RENEWAL

Additional comments to January 26, 1993 correspondence.

#### 13. R645-301-700

##### Remaining Deficiencies:

1. Shallow and deep water levels appear to be reversed in well W35-1.
2. Contour lines on Plate 2.3.4-2 don't correspond with water levels given for well W22-2 (and for well W35-1 if the shallow and deep values have been switched).
3. Well W26-1 monitors the shallow aquifer rather than the deep aquifer as shown on Plate 2.3.4-2.

##### **ORIGINAL RESPONSE:**

1. The well water levels are reversed on well W35-1.
2. The contour lines will be reviewed with the consultant and revisions made as appropriate.
3. Well W26-1 is indeed a shallow well and the notation on Plate 2.3.4-2 will be corrected.

The above three items all require corrections to Plate 2.3.4-2. A revised map will be submitted after a review by the consultant. A new submittal will be made March 1, 1993.

##### **ADDITIONAL RESPONSE:**

A revised plate 2.3.4-2 is attached.

#### 14. R634-301-728

##### Remaining Deficiency:

1. A determination of the PHC to the cutthroat trout spawning habitat in Burnout Creek and Upper Huntington Creek, based on knowledge, has not been made.

##### **ORIGINAL RESPONSE:**

The value of the cutthroat trout spawning habitat in Burnout Creek and upper Huntington Creek is currently being evaluated by the Forest Service under the direction of personnel at the Intermountain Research Station in Logan. Releasable reports on this study are not yet available. As stated previously,

the applicant does not control this study, so it is inappropriate to make it a subject of Division comment and modification in the M&RP. As reports become available, copies will be made and sent to the Division to be inserted as consultant documents in the proper M&RP appendix. This will aid in the preparation of future PHC's and CHIA's.

**ADDITIONAL RESPONSE**

The PHC text has been expanded to include additional discussion on the potential for reduction of Burnout Creek fishery habitat value due to subsidence. (See Pages PHC3-5 and PHC-14A.)

**15. R645-301-731.200**

Remaining Deficiencies:

1. If wells W22-2-2 and W14-2B have been abandoned, proper abandonment procedures have not been followed.
2. The MRP does not contain data and arguments that support abandonment of monitoring the Star Point Aquifer at wells W22-2-2 and W14-2B.

**ORIGINAL RESPONSE:**

The status of these two failed wells will need to be the subject of further discussion with the Division, particularly in the area of their validity in establishing the PHC.

An approach to the Forest Service concerning the possibility of re-establishing these wells was met with a firm negative response, because of the resulting environmental damage. A mutually agreeable response will be attempted by March 1, 1993.

**ADDITIONAL RESPONSE:**

All available data have been included either in Vol. 4 or in Appendix Vol. A-1.

Wells W14-2B and W22-2-2 are both deep wells originally designed to provide data on the thickness and quality of the coal seams. An additional benefit was data provided on the aquifer immediately below the coal seams. All of the deep

wells have provided such information including the fact that the heads on these wells may on occasion be higher than wells drilled into shallow aquifers.

It has always been recognized that these deep wells would either be destroyed or, at a minimum, the pressure in these deep aquifers would be changed by mining activity. It is not known if mining caused the casing of these two wells to fail or if the failures were due to natural causes. In either event, these wells had completed their primary purpose.

The remaining purpose of the well system is to assist in the establishment of the Probable Hydrologic Consequences, which is, in turn, related to water rights issues. The possibility of impacting these rights is partially evaluated through the use of the Potentiometric Surface Map. (See Plate 2.3.4-2.) This map is based on wells drilled into the shallow aquifers, and has no input from the deeper wells. It should also be noted that according to the State Engineer, Robert Morgan, no water rights exist on water intercepted underground during mining operations.

Based on the above factor, the applicant feels that there is no reason not to abandon the failed wells and has no plans to drill replacement wells.

Section 2.3 of the M&RP has been modified to document the closure of these two wells and a commitment made to use an appropriate abandonment procedure.

In addition to answering the above deficiencies, we have also included a complete copy of the PHC. This copy includes changes, as noted, and also incorporates a renumbering of all PHC pages to eliminate confusion.