

0007



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

# State of Utah

DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF OIL, GAS AND MINING

355 West North Temple  
3 Triad Center, Suite 350  
Salt Lake City, Utah 84180-1203  
801-538-5340

007/005 #2

March 26, 1993

**TO:** File

**THROUGH:** Daron Haddock, Permit Supervisor

**FROM:** James D. Smith *ADS*

**RE:** ACT/007/005-92-K; Additional Responses to DO #92C,  
Received February 26, 1993  
Coastal States Energy Company and Skyline Coal Company  
Skyline Mine  
ACT/007/005, Folder #2, Carbon County, Utah

Deficiencies from my Technical Completeness Review dated January 18, 1993 have, with one exception, been satisfied to at least some degree. The one remaining unaddressed deficiency and the possible need for clarification or expansion on some of those to which Coastal has responded are not reasons to further prolong the permit renewal process. A brief analysis of each deficiency and Coastal's response follows.

1. *Shallow and deep water levels appear to be reversed in well W35-1.*

**and**

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).*

**and**

3. *Well W26-1 monitors the shallow aquifer rather than the deep aquifer as shown on Plate 2.3.4-2.*

The necessary changes have been made to Plate 2.3.4-2.

4. *Plate 2.3.4-2, Plate 2.2.1-2, Figure 2-30B, Figure 2-30C, and Figure 2-30D, which were submitted to satisfy deficiencies to the MRP, are not certified as having been prepared by or under the direction of a qualified registered professional engineer or land surveyor as required by R645-301-512.140 and R645-301-722.*

These Plates and Figures have been certified.

5. *The ground water elevation measured in well 92-91-03MW and used in characterizing the regional ground water system should be shown on Plate 2.2.1-2, the cross section showing geology and hydrology of the waste rock disposal site.*

**and**

6. *The ground water elevation measured in well 92-91-03MW and used in characterizing the regional ground water system should be added to Plate 2.3.4-2, the potentiometric surface map.*

Coastal has committed in a letter dated March 17, 1993 to include a complete discussion of data from the well at the waste rock disposal site as a modification to the M&RP, but it is to be done after the current permit renewal process is completed.

7. *A determination of the Probable Hydrologic Consequences (PHC) of the coal mining operation on the fish spawning habitats in Upper Huntington Creek, including Burnout Canyon, is still missing from the M&RP.*

A discussion of the PHC to the fishery in Burnout Creek has been added to pages PHC3-5 and PHC3-14A. Of the possible impacts, loss of stream flow due to capture of surface drainage would produce the most serious and most immediate impact. However, probability of flow loss or other impacts is considered to be minor to non-existent.

8. *There are no data for sampling point M-1 to support the statement on page 2-33 concerning the downstream increase in sulfate and magnesium in Pleasant Valley Creek. Either data for that point are available or other data points were used to arrive at the conclusions on page 2-33.*

This is the only deficiency to which Coastal has not made any response. No information on sampling point M-1 has been added to the M&RP, nor has another point been identified as the source of the information used to make the determination on page 2-33. It is not a critical issue but rather a detail that should be clarified.

9. *The M&RP does not contain data and arguments to support abandonment of monitoring of the Star Point aquifer at W22-2-2 and W14-2B, and the Division of Oil, Gas, and Mining has not approved modification of the monitoring plan to omit these points. There are unresolved problems concerning the data that were used in the original determination of the PHC, and also with the idea of abandoning ground water monitoring at W22-2-2 and W14-2B. These problems may not be resolvable within the time frame or scope of this permit renewal.*

Tables 2.3.7-1, 2.3.7-2, 2.3.7-3, and 2.3.7-4 now clearly indicate that W22-2-2 and W14-2B are no longer useable, and comments on the intended uses, present condition, and abandonment have been added to the text. However, the best arguments for abandoning wells W22-2-2 and W14-2B are in the letters accompanying Skyline's responses rather than in

the M&RP itself. There does not seem to be a compelling reason to repair or replace these two wells. I recommend that abandonment of the two wells, described in Section 2.3 and other places, should be accepted as part of the M&RP. For clarity, future modifications to the M&RP should more completely incorporate the reasoning contained in Coastal's letters.

Coastal's letter dated March 17, 1993 confirms that other problems, which may be the result of misinterpretation or misreading of potentiometric data when the monitoring wells were initially installed, can be addressed more appropriately at a later date and not as part of the permit renewal process.

Page 2-35 contains a commitment to follow procedures in Section 4.9 in abandoning these wells. With restrictions on access to the well sites by the USFS and collapsed casing in the bore holes, I question if Coastal can actually abandon the wells in the manner described in Section 4.9. This is one of the points that may require further clarification in future modifications to the M&RP.

h:\...\skyline.jds