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

Michael O. Leavitt
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May 7, 1993

Mr. Glen Zumwalt
Utah Fuel Company
P. O. Box 719
Helper, Utah 84526

Dear Mr. Zumwalt:

Re: Denial of Water Monitoring Modification, Coastal States Energy Company,
Skyline Mine, ACT/007/005-93A, Folder #3, Carbon County, Utah

The Division has completed a review of your permit change application received on April 26, 1993, in which Skyline had proposed to alter water monitoring requirements. The submittal is not considered adequate to allow the proposed changes, therefore the application for change is hereby denied. You should continue to monitor according to your previously approved plan.

The enclosed technical memo discusses the deficiencies in your submittal. You may want to review the memo, address the deficiencies and resubmit your proposal.

Please call me or Sharon Falvey if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Daron R. Haddock".

Daron R. Haddock
Permit Supervisor

cc: S. Falvey
S. Demczak
J. Helfrich

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May 5, 1993

TO: File

THRU: Daron Haddock, Permit Supervisor

FROM: Sharon Falvey, Senior Reclamation Hydrologist *SFK*

RE: Water Monitoring Modification, Recommend Denial, Coastal States Energy Company, Skyline Mine, ACT/007/005-93C, Folder #2, Carbon County, Utah

SUMMARY:

Coastal States Energy Company proposes to amend the current monitoring plan. The Operator has proposed eliminating some parameters as well as changing the timing of some sampling sites. Although the Operator's proposal may be adequate, the Operator has failed to present a discussion supporting the proposed changes as required in R645-301-731 regulation. Therefore, this application is recommended for denial.

The Operator should address section R645-301-731.200 which requires water monitoring plans to be *"...based upon the PHC determination required under R645-301-728 and the analysis of all baseline hydrologic, geologic and other information in the permit application. The plan will provide for the monitoring of parameters that relate to the suitability of the ... water for current and approved postmining land uses and to the objectives for protection of the hydrologic balance ... It will describe how these data may be used to determine the impacts of the operation upon the hydrologic balance..."*.

Section R645-301-731.200 provides authority to the Division to modify monitoring requirements *"... if the Operator demonstrates, using the monitoring data obtained...that Monitoring is no longer necessary to achieve the purposes set forth in the monitoring plan approved..."*.

When considering eliminating monitoring sites from the plan the Operator should discuss why the site is no longer necessary. Past, present, and



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proposed mining sequences should be related to the monitoring plan where applicable. The Operator should review information from the currently approved monitoring plan (1986) and discuss why a parameter is no longer necessary via demonstration with data analysis. Since this is a proposed amendment the Operator should be sure the suitability criteria and description on how data may be used to determine impacts is adequately discussed. Additionally, it was noted the copy of the NPDES permit was not included as indicated in the submittal.

The Operator is encouraged to pursue modifications to the monitoring plan to provide increased efficiency in data collection and information that is specific to the site conditions. At this time the Operator should continue to sample water quality according to the approved monitoring plan.

cc: Steve Demczak, PFO
Ken Wyatt, DOGM
SKYLWATE.DNY