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

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May 25, 2001

TO: Internal File

FROM: Michael J. Suflita, Reclamation Hydrologist *MS*

RE: Fire Emergency Pumping, Canyon Fuel Company, Skyline Mine, C/007/005-AM01C

**SUMMARY:**

On May 14, 2001 the Division received an amendment to revise the Mining and Reclamation Plan (MRP) to include a provision to use water from the sediment pond for fire emergencies. This Technical Memo is a review of the proposal. There are no deficiencies.

**TECHNICAL ANALYSIS:**

**OPERATION PLAN**

**HYDROLOGIC INFORMATION**

Regulatory Reference: 30 CFR Sec. 773.17, 774.13, 784.14, 784.16, 784.29, 817.41, 817.42, 817.43, 817.45, 817.49, 817.56, 817.57; R645-300-140, -300-141, -300-142, -300-143, -300-144, -300-145, -300-146, -300-147, -300-147, -300-148, -301-512, -301-514, -301-521, -301-531, -301-532, -301-533, -301-536, -301-542, -301-720, -301-731, -301-732, -301-733, -301-742, -301-743, -301-750, -301-761, -301-764.

**Analysis:**

**Discharges into an underground mine**

The amendment proposes to use the sediment pond as a "water resource in case of a fire emergency either on the surface or underground." This means that the pond water has the

TECHNICAL MEMO

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potential to be pumped underground. Further, "the water will be tested to meet UPDES permit requirements before pumping. (and) will be tested once a week during underground pumping." These conditions are consistent with the regulatory requirements for such water pumped underground to not result in a violation of applicable water quality standards. Basically, the water will meet UPDES requirements regardless of where it's discharged. Above-ground water for fire fighting would drain back into the sediment pond.

The nature of a fire emergency is such that life and property are in jeopardy. This action is being sought in preparation for such an event. As explained in the amendment, the time of water pumping is limited to the duration of the emergency. Therefore, the volume of water is expected to be minimal compared to that pumped out of the mine. It's worth noting that the Probable Hydrologic Consequences section of the MRP indicates that the mine will eventually fill up with groundwater anyway. The water in the sediment pond is over 95% derived from water pumped out of the mine. Thus, this is largely a matter of pumping groundwater into the pond and then returning it back underground. Therefore, such emergency pumping is expected to cause a minimal disturbance to the Hydrologic Balance and not cause material damage outside the permit area.

MSHA has been informed of and approves of the use of sediment pond water being pumped underground to fight fires located there. This meets regulatory requirements for such MSHA approval.

A check with the State Engineer, Bob Morgan, concluded that there are no water rights issues to be addressed for this fire emergency pumping of water.

**Finding:**

Information provided in the proposal is adequate to meet the requirements of this section of the regulations.

**RECOMMENDATION:**

The amendment can be approved in its present form.