



Canyon Fuel Company, LLC
Skyline Mines
 HC 35 Box 380
 Helper, Utah 84526
 (435) 448-6463 Fax: (435) 448-2632

RECEIVED

JUL 22 2005

DIV. OF OIL, GAS & MINING

INCOMING
C007005

July 8, 2005

Mr. D. Wayne Hedberg
 Permit Supervisor
 Utah Division of Oil, Gas and Mining
 1594 West North Temple, Suite 1210
 Salt Lake City, Utah 84114-5801

RE: Application to Reduce Laboratory Analysis at Selected Water Monitoring Sites,
 Canyon Fuel Company, LLC, Skyline Mine, C/007/005

Dear Mr. Hedberg:

Please find enclosed with this letter Skyline Mine's application to reduce laboratory analysis on various water monitoring sites within the permit area. This submittal includes completed C1 and C2 forms, seven redline/strikethrough copies of modified text, and graphs of the water quality of each site requested for laboratory analysis reduction. When reviewing the redline/strikethrough copies, keep in mind that pagination will not match the current M&RP. Pagination will be correct in the clean copies. Clean copies will be sent once the text modifications are approved.

Skyline Mine has conducted a review of the water quality monitoring data collected over the past 23 years and is requesting a reduction in laboratory analysis at eight (8) stream sites and thirteen (13) spring sites of the total 126 water monitoring sites the Mine currently monitors or is proposed for monitoring. All 21 sites are located in the southern portion of the permit area where mining is no longer being conducted and the mine workings are flooded. Skyline Mine is requesting that laboratory analysis be suspended at all the noted sites. Field parameters will continue to be sampled on the current frequency. Should future field parameters indicate significant changes, laboratory analysis would resume. Field parameters would include flow, Specific Conductivity, pH, both water and air temperature, turbidity, and dissolved oxygen.

Included for each stream and spring monitoring site is a graph illustrating the trend of the fundamental parameters Total Dissolved Solids (TDS), Specific Conductivity (Sp. Cond.), Sulfate (SO₄), Total Iron (T-Fe), and Total Manganese (T-Mn). Each graph also adequately demonstrates: 1) historically there have not been upward trends or elevated concentrations of the parameters listed; and 2) Specific Conductivity tracks well enough with TDS to be used as indicator of changing TDS concentrations. Although there are some anomalies or outliers in the data, a review of the considerable historic data does not indicate mining has affected the hydrologic balance in the area. Having not noted any effects to the hydrologic balance due to mining, sampling can be reduced to field parameters.

Skyline Mines
July 8, 2005

M&RP Modification
Reduce Laboratory Analysis
Page 2

We at Skyline Mine, appreciate your review of this application. If you have any questions, please call me at (435) 448-2636.

Sincerely,

A handwritten signature in blue ink that reads "Gregg A. Galecki". The signature is written in a cursive style with a large initial 'G'.

Gregg A. Galecki
Environmental Engineer, Skyline Mine
Canyon Fuel Company, LLC

enclosures

APPLICATION FOR COAL PERMIT PROCESSING

Permit Change New Permit Renewal Exploration Bond Release Transfer

Permittee: Canyon Fuel Company, LLC

Mine: Skyline Mine

Permit Number: C/007/005

Title: Revise Water Monitoring Table

Description, Include reason for application and timing required to implement:

Modification to the M&RP to reduce laboratory analysis - Revised Table 2.3.7-1.

Instructions: If you answer yes to any of the first eight (gray) questions, this application may require Public Notice publication.

- Yes No 1. Change in the size of the Permit Area? Acres: _____ Disturbed Area: _____ increase decrease.
- Yes No 2. Is the application submitted as a result of a Division Order? DO# _____
- Yes No 3. Does the application include operations outside a previously identified Cumulative Hydrologic Impact Area?
- Yes No 4. Does the application include operations in hydrologic basins other than as currently approved?
- Yes No 5. Does the application result from cancellation, reduction or increase of insurance or reclamation bond?
- Yes No 6. Does the application require or include public notice publication?
- Yes No 7. Does the application require or include ownership, control, right-of-entry, or compliance information?
- Yes No 8. Is proposed activity within 100 feet of a public road or cemetery or 300 feet of an occupied dwelling?
- Yes No 9. Is the application submitted as a result of a Violation? NOV # _____
- Yes No 10. Is the application submitted as a result of other laws or regulations or policies?
Explain: _____
- Yes No 11. Does the application affect the surface landowner or change the post mining land use?
- Yes No 12. Does the application require or include underground design or mine sequence and timing? (Modification of R2P2)
- Yes No 13. Does the application require or include collection and reporting of any baseline information?
- Yes No 14. Could the application have any effect on wildlife or vegetation outside the current disturbed area?
- Yes No 15. Does the application require or include soil removal, storage or placement?
- Yes No 16. Does the application require or include vegetation monitoring, removal or revegetation activities?
- Yes No 17. Does the application require or include construction, modification, or removal of surface facilities?
- Yes No 18. Does the application require or include water monitoring, sediment or drainage control measures?
- Yes No 19. Does the application require or include certified designs, maps or calculation?
- Yes No 20. Does the application require or include subsidence control or monitoring?
- Yes No 21. Have reclamation costs for bonding been provided?
- Yes No 22. Does the application involve a perennial stream, a stream buffer zone or discharges to a stream?
- Yes No 23. Does the application affect permits issued by other agencies or permits issued to other entities?

Please attach four (4) review copies of the application. If the mine is on or adjacent to Forest Service land please submit five (5) copies, thank you. (These numbers include a copy for the Price Field Office)

I hereby certify that I am a responsible official of the applicant and that the information contained in this application is true and correct to the best of my information and belief in all respects with the laws of Utah in reference to commitments, undertakings, and obligations, herein.

Wesley K Sorensen
Print Name

Wesley K Sorensen
Sign Name, Position, Date

Subscribed and sworn to before me this 18 day of July, 2005

General Manager
7/18/05

Kathleen Atwood
Notary Public

My commission Expires: _____
Attest: State of Utah } ss:
County of Carbon



For Office Use Only: 	Assigned Tracking Number: 	Received by Oil, Gas & Mining <div style="font-size: 2em; color: red; font-weight: bold;">RECEIVED</div> <div style="font-size: 1.5em; color: red; font-weight: bold;">JUL 22 2005</div> <div style="font-size: 1.2em; color: red; font-weight: bold;">DIV. OF OIL, GAS & MINING</div>
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Table 2.3.7-1
 Comprehensive Water Quality Analytical Schedule
 (Surface and Ground Water Stations)

<u>Streams</u>	<u>Protocol</u>	<u>Comments</u>
CS-1	A 1, 2, 6, 7 12	
CS-3	A 1, 2, 6, 7	
CS-4	A 1, 2, 6, 7	
CS-6	A' 1, 2, 3, 6, 7, 10	
CS-7 (F-5)	A 1, 2 12	
CS-8	A 1, 2 12	
CS-9	A 1, 2, 6, 7	
CS-10	A 1, 2 12	
CS-11	A 1, 2, 6, 7	
CS-12	A' 1, 2, 3, 6, 7	
CS-13	A' 1, 2, 3, 6, 7	
CS-14	A' 1, 2, 3, 6, 7	
CS-15	A 13	
CS-16	A 1, 2 12	
CS-17	A 1, 2 12	
CS-18	A 1, 2 12	
CS-19	A 1, 2	
CS-20	A 1, 2	
CS-21	A 1, 2	
CS-22	D 11	
CS-23	D 11	
MD-1	A' 1, 2, (Mine discharge - CS-12 and CS-14 combined)	
SRD-1	B (Same as MD-1)	
F-9	C 12	
F-10	A 1, 2 and C	
UP&L-10	A 1, 2	
VC-6	A' 1, 2, 3, 6, 7, 9	
VC-9	A' 1, 2, 3, 6, 7, 8, 9	Flow is sum of CS-6 and CS13
VC10	A' 1, 2, 3, 6, 7 12	
VC11	D 10	
VC12	D 10	
MC-1	A' 4	
MC-2	A' 4	
MC-3	A' 4	
MC-4	A' 4	
MC-5	A' 4	
MC-6	A' 4	
NL-1	F 12	North Lease Subsidence Points
NL-2	F 12	North Lease Subsidence Points
NL-3	F 12	North Lease Subsidence Points
NL-4	F 12	North Lease Subsidence Points
NL-5	F 12	North Lease Subsidence Points
NL-6	F 12	North Lease Subsidence Points
NL-7	F 12	North Lease Subsidence Points
NL-8	F 12	North Lease Subsidence Points
NL-9	F 12	North Lease Subsidence Points
WRDS #1	A 1, 2, 6, 7	
WRDS #2	A 1, 2, 6, 7	
WRDS #3	A 1, 2, 6, 7	
WRDS #4	A 1, 2, 6, 7	
EL-1	A 13	Sample spring, summer, and fall for
EL-2	A 13	3 years beginning in 2004

Table 2.3.7-1 (cont.)
 Comprehensive Water Quality Analytical Schedule
 (Surface and Ground Water Stations)

<u>Springs</u>	<u>Protocol</u>	<u>Comments</u>
S10-1	A 1, 2	
S12-1	A 1, 2	
S13-2	A 1, 2 12	
S13-7	A 1, 2	
S14-4	A 1, 2 12	
S15-3	A 1, 2 12 13 (13 - spring and fall for 3 years starting in 2004)	
S17-2	A 1, 2	
S22-5	A 1, 2 12	
S22-11	A 1, 2 12	
S23-4	A 1, 2 12	
S24-1 Sulfur Spring	A 1, 2, 13 (13 - spring and fall for 3 years starting in 2004)	
S24-12	A 1, 2 12	
S26-13	A 1, 2 12	
S34-12	A 1, 2 12	
S35-8	A 1, 2 12	
S36-12	A 1, 2 12	
2-413	A 1, 2 12 13 (13 - spring and fall for 3 years starting in 2004)	
3-290	A 1, 2 12	
8-253	G 13	Sampled spring and fall for 3 years starting in 2004
WQ1-39	A 1, 2	
WQ3-6	A 1, 2	
WQ3-26	A 1, 2	
WQ3-41	A 1, 2	
WQ3-43	A 1, 2	
WQ4-12	A 1, 2	
<u>Wells</u>		
JC-1	A 5 and B	
JC-3	A 4 and B	
ELD-1	B	(JC-1 and JC-3 combined)
W79-10-1B	E 11	
W79-14-2A	E 11	
W79-26-1	E 11	
W79-35-1A	E 11	
W79-35-1B	E 11	
W2-1 (98-2-1)	E 11	
W20-4-1	E 11	
W20-4-2	E 11	
W99-4-1	E 11	
W99-21-1	E 11	
W99-28-1	E 11	
W20-28-1	E 11	
91-26-1	E 11	
91-35-1	E 11	

Table 2.3.7-1 (cont.)
Comprehensive Water Quality Analytical Schedule
(Surface and Ground Water Stations)

Field and Laboratory Measurement Protocol

Water Level and Flow Measurements

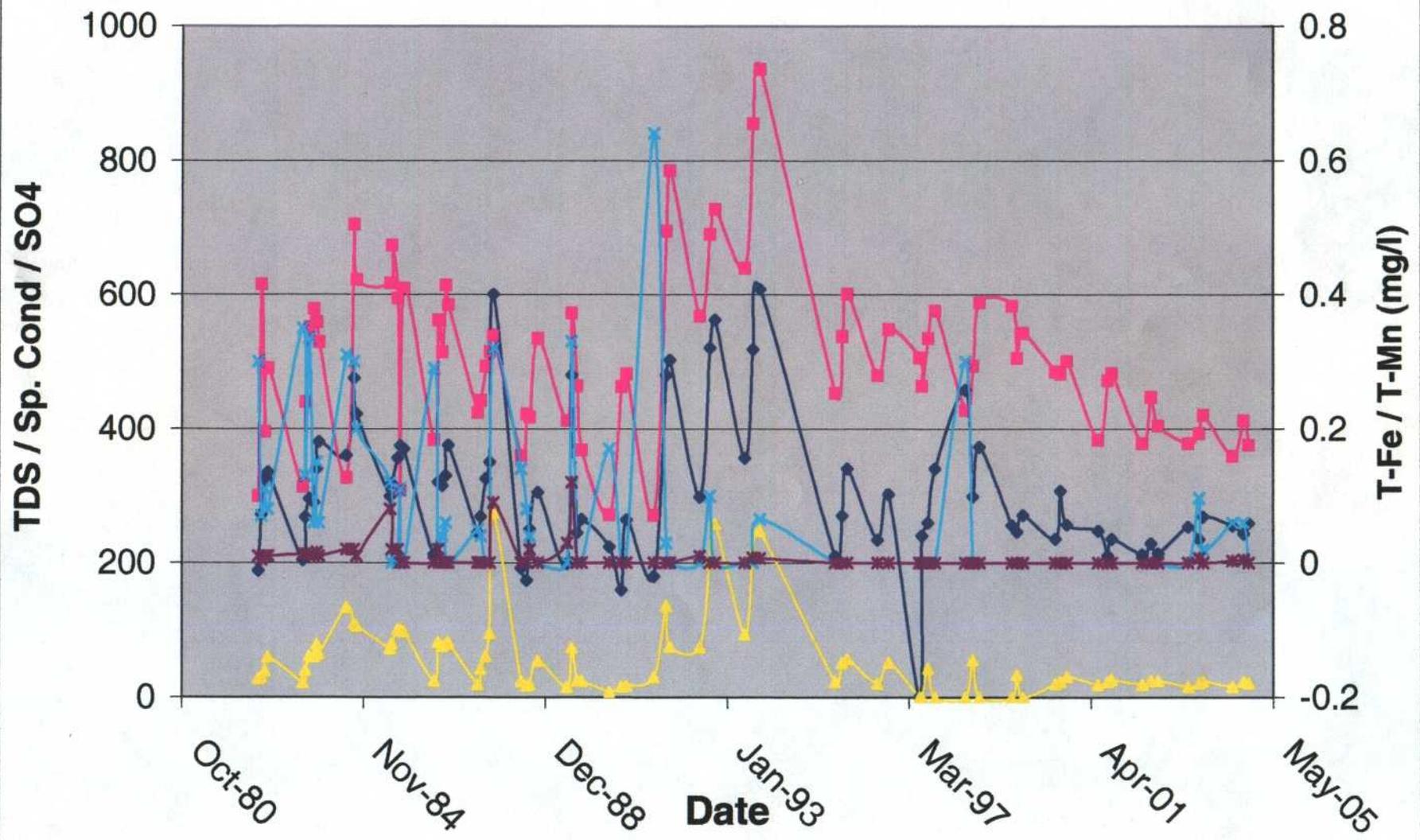
- A Stream and Springs: high spring (April - June), low summer flow (August - September), and late fall (October - November)
- A' Stream and Springs: winter season (December - February) monitoring included
- B Stream, Springs, and Wells: monthly discharge measurements, reported in first 7 days following end of month
- C Stream and Springs: monthly flows when accessible.
- D Stream: seasonal discharge measurements (April - June, August - September, October - November)
- E Monitoring well: seasonal water level measurement (April - June, August - September, October - November)
- F Streams: monthly flows June through October, earlier and later if accessible. To be monitored one year prior to, during, and one year following undermining.
- G Springs: high spring and late fall sampling

Water Quality

- 1 High spring and late fall (April - June and October - November) water quality field and operational laboratory measurements
- 2 Low summer flow (August - September) water quality field and operational laboratory measurements
- 3 Winter season (December - February) water quality field and operational laboratory measurements
- 4 Seasonal water quality field measurements, TDS, TSS, and total phosphorous
- 5 Seasonal water quality field measurements, TDS, TSS, and total phosphorous, C14, tritium, and stable isotopes deuterium and oxygen 18
- 6 Also oil and grease, phenols
- 7 Total organic carbon and cyanide (low summer flow only)
- 8 Also total phosphorous
- 9 Also dissolved oxygen
- 10 Seasonal flow only
- 11 Seasonal water levels
- 12 Field parameters only
- 13 Tritium

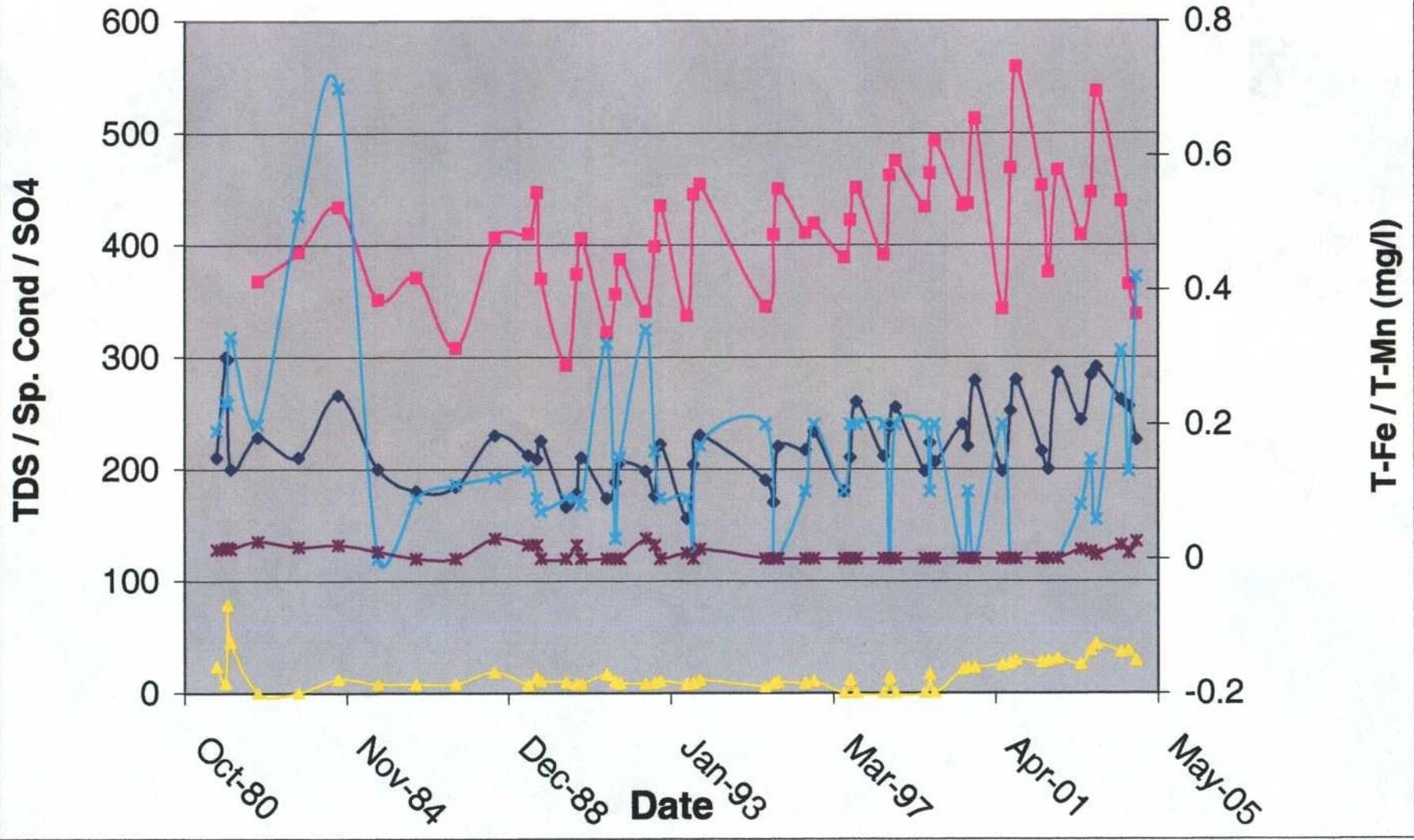
CS-1

—●— TDS —■— Sp. Cond —▲— SO4 —×— T-Fe —*— T-Mn



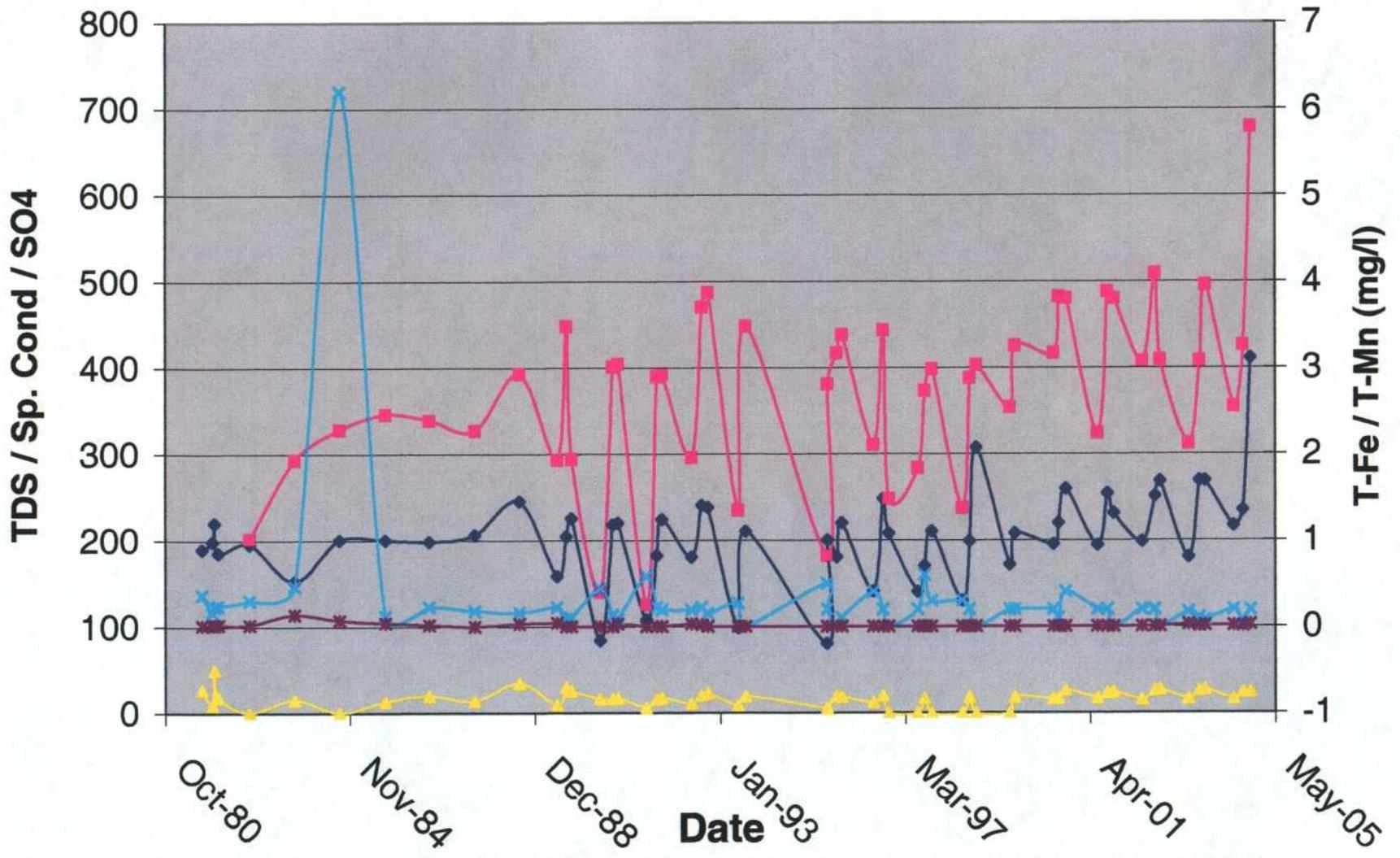
CS-7

—◆— TDS —■— Sp. Cond —▲— SO4 —×— T-Fe —*— T-Mn

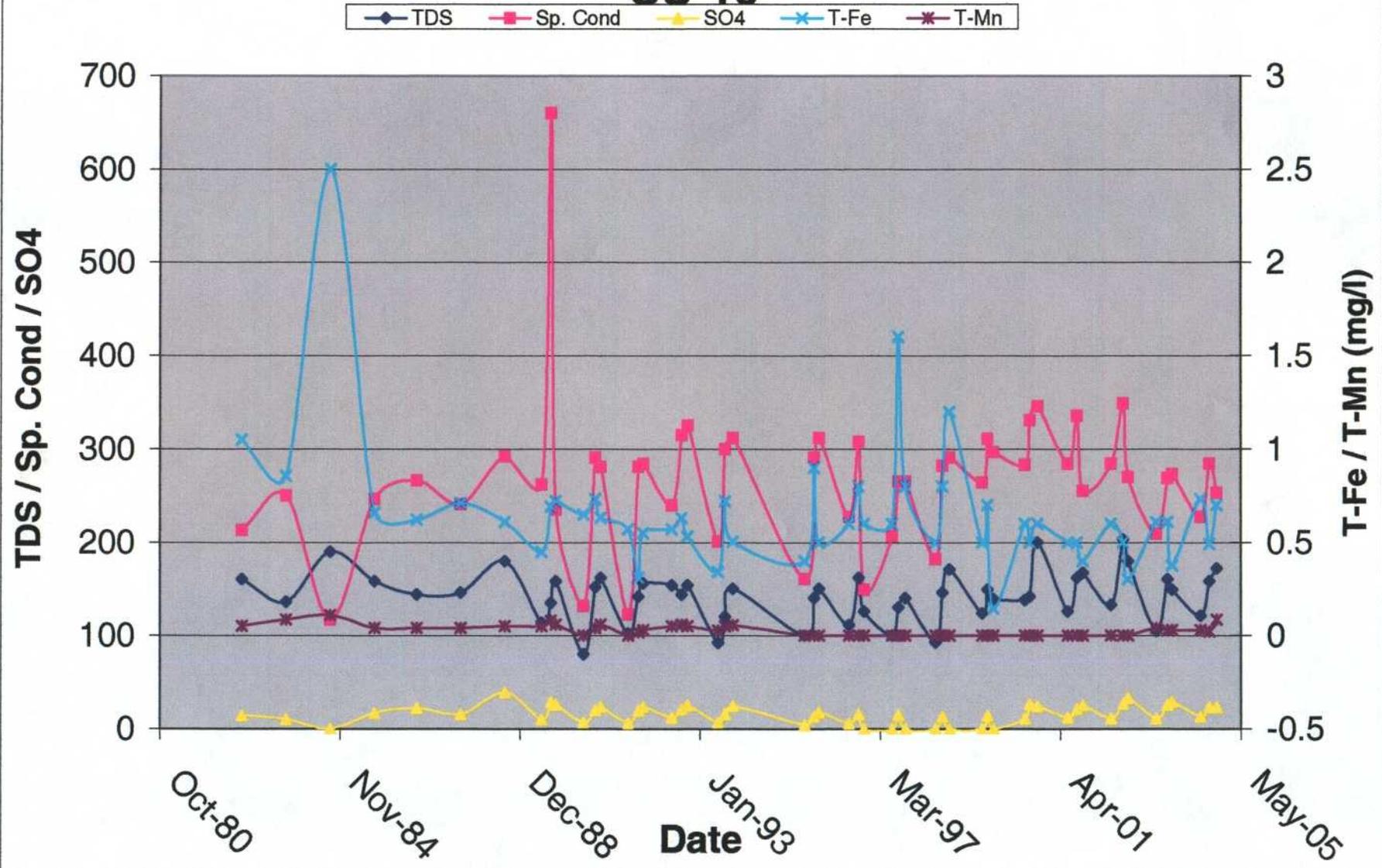


CS-8

—◆— TDS —■— Sp. Cond —▲— SO4 —×— T-Fe —*— T-Mn

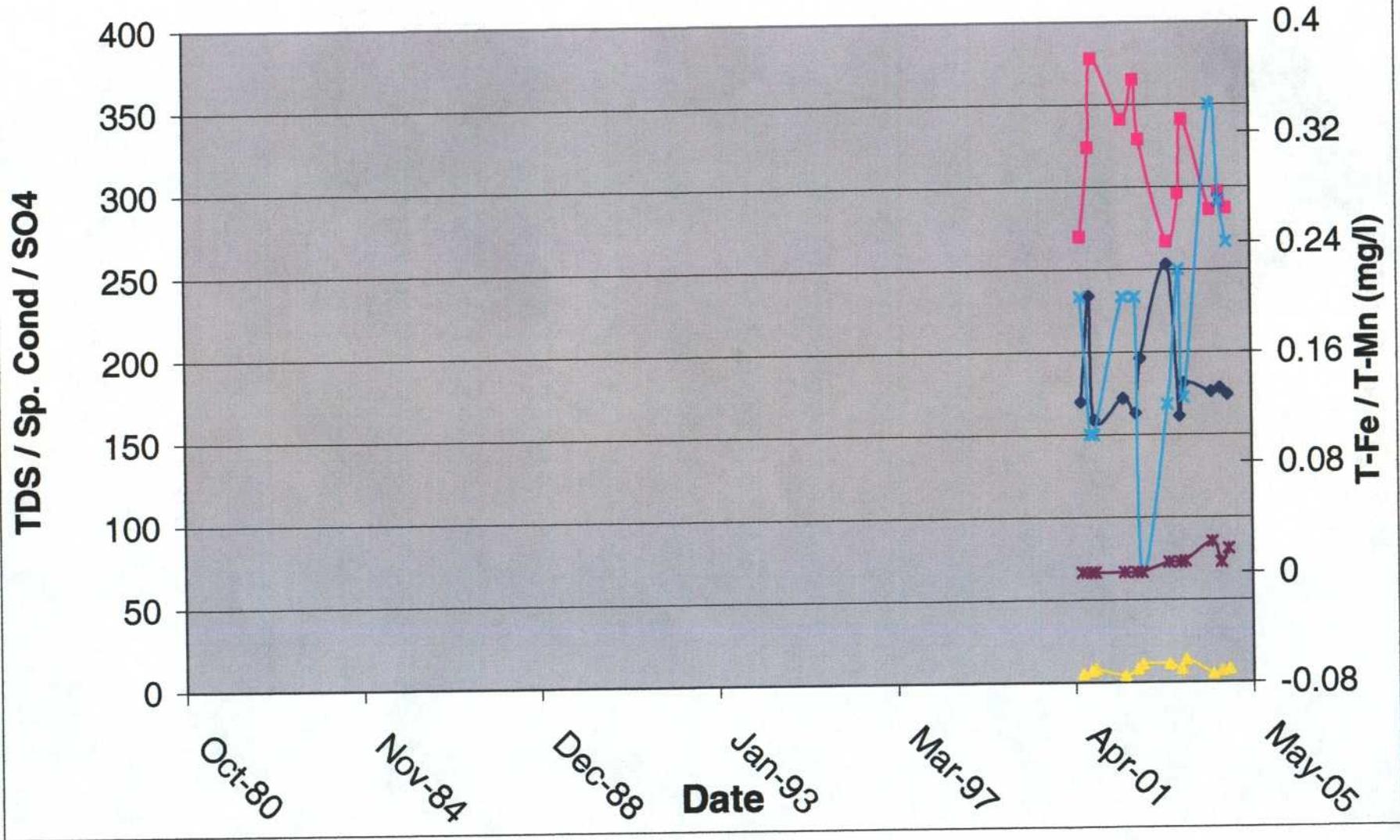


CS-10



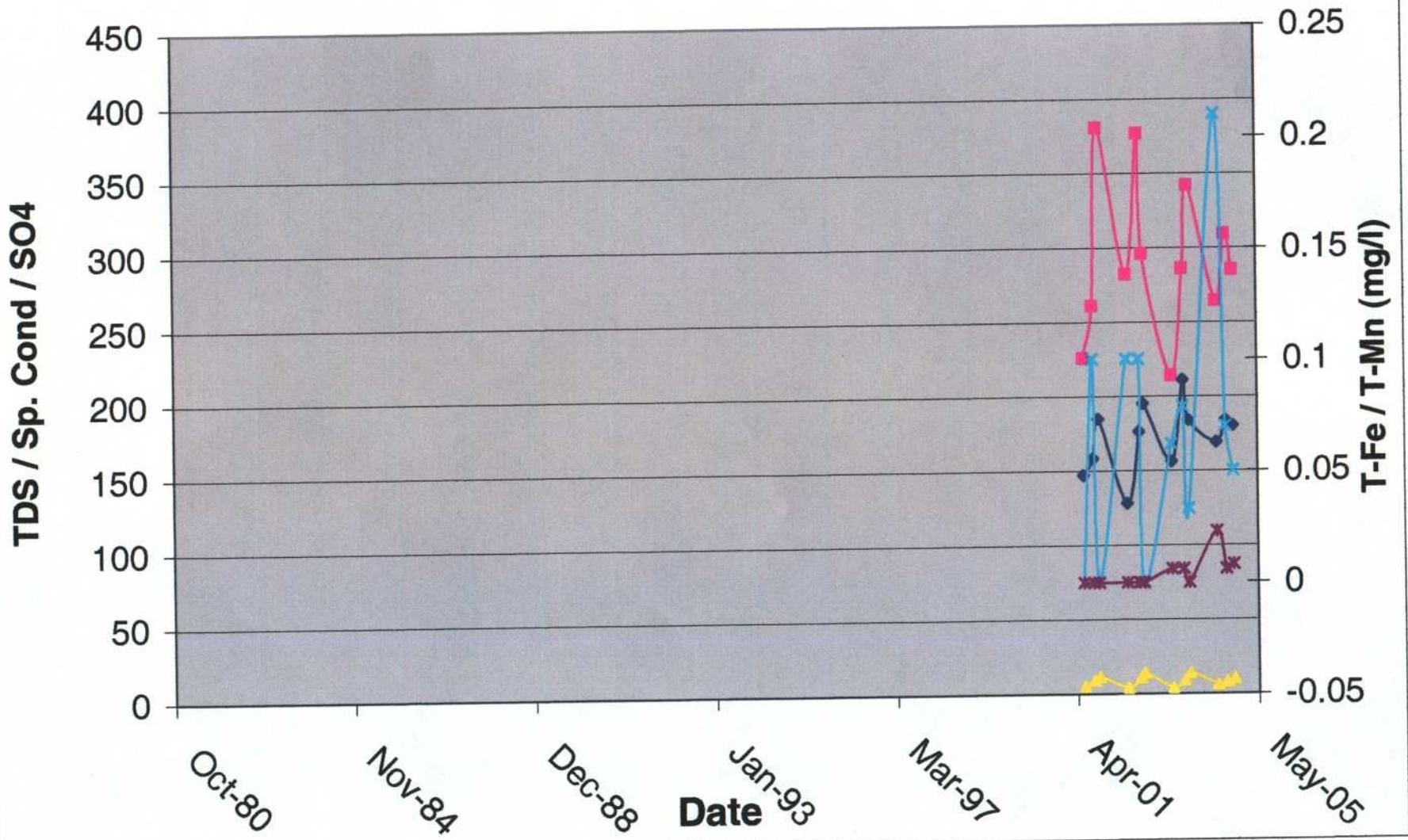
CS-16

◆ TDS ■ Sp. Cond ▲ SO4 × T-Fe * T-Mn



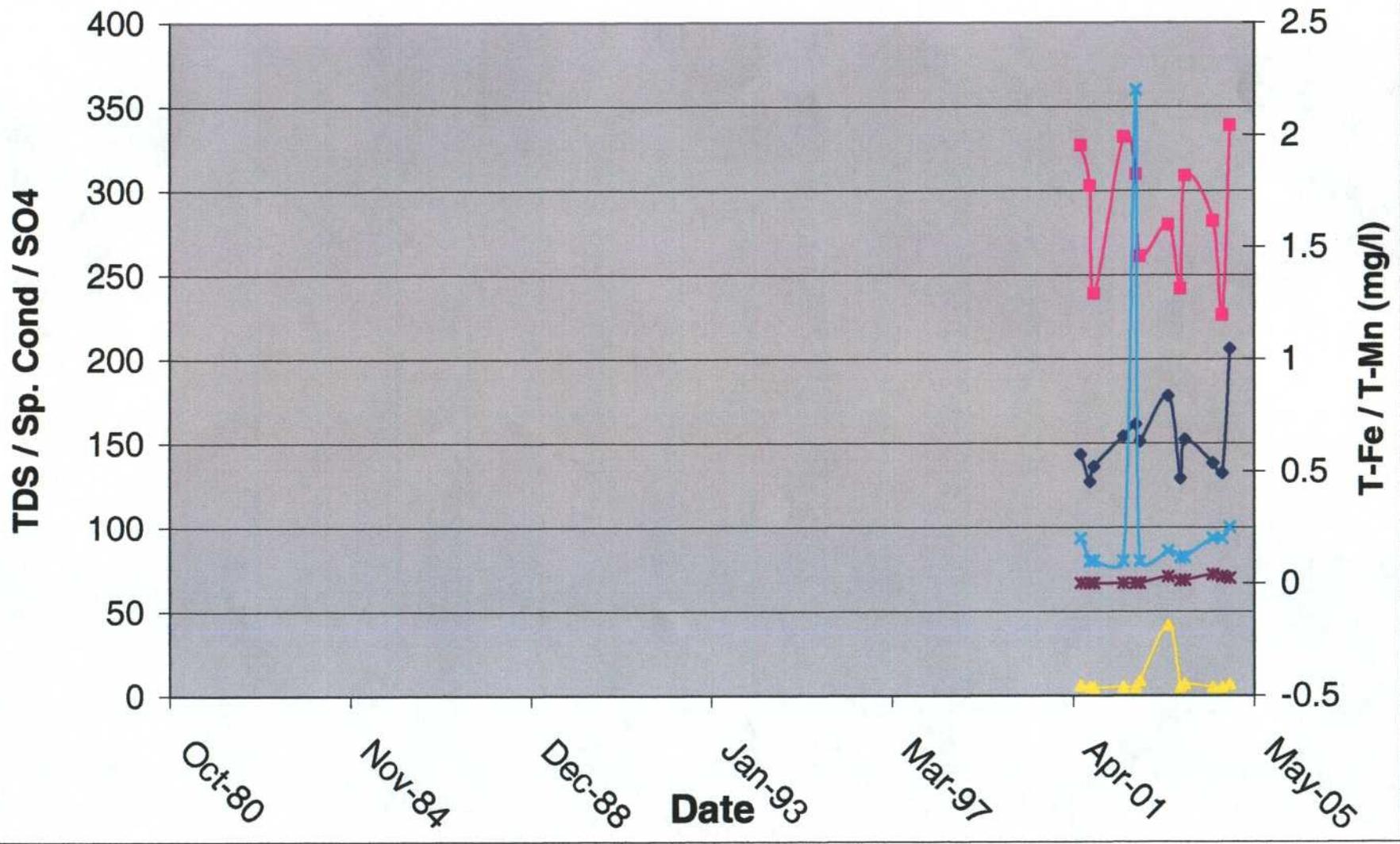
CS-17

—◆— TDS —■— Sp. Cond —▲— SO4 —×— T-Fe —*— T-Mn



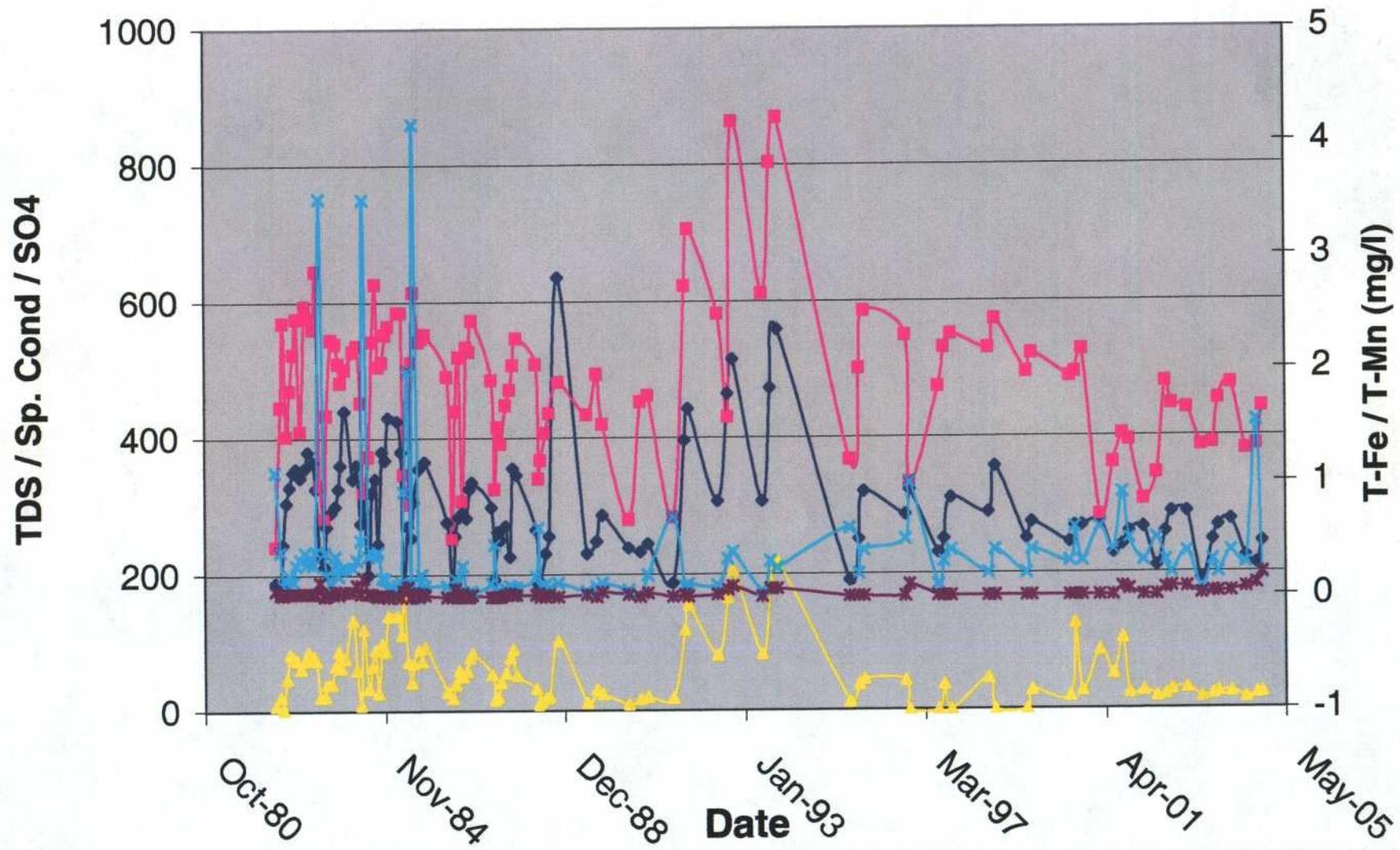
CS-18

◆ TDS ■ Sp. Cond ▲ SO4 × T-Fe * T-Mn



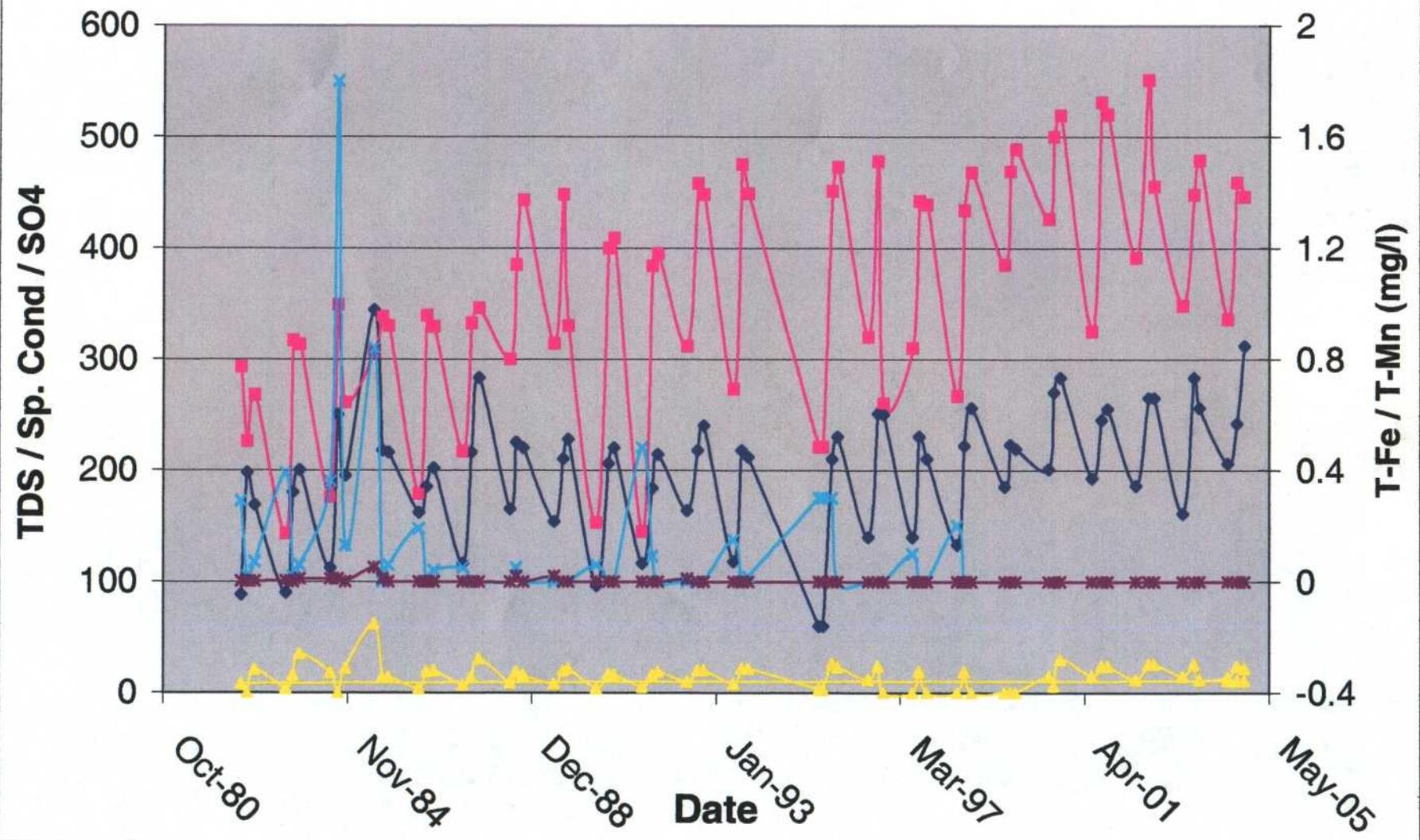
VC-10

—◆— TDS —■— Sp. Cond —▲— SO4 —×— T-Fe —*— T-Mn



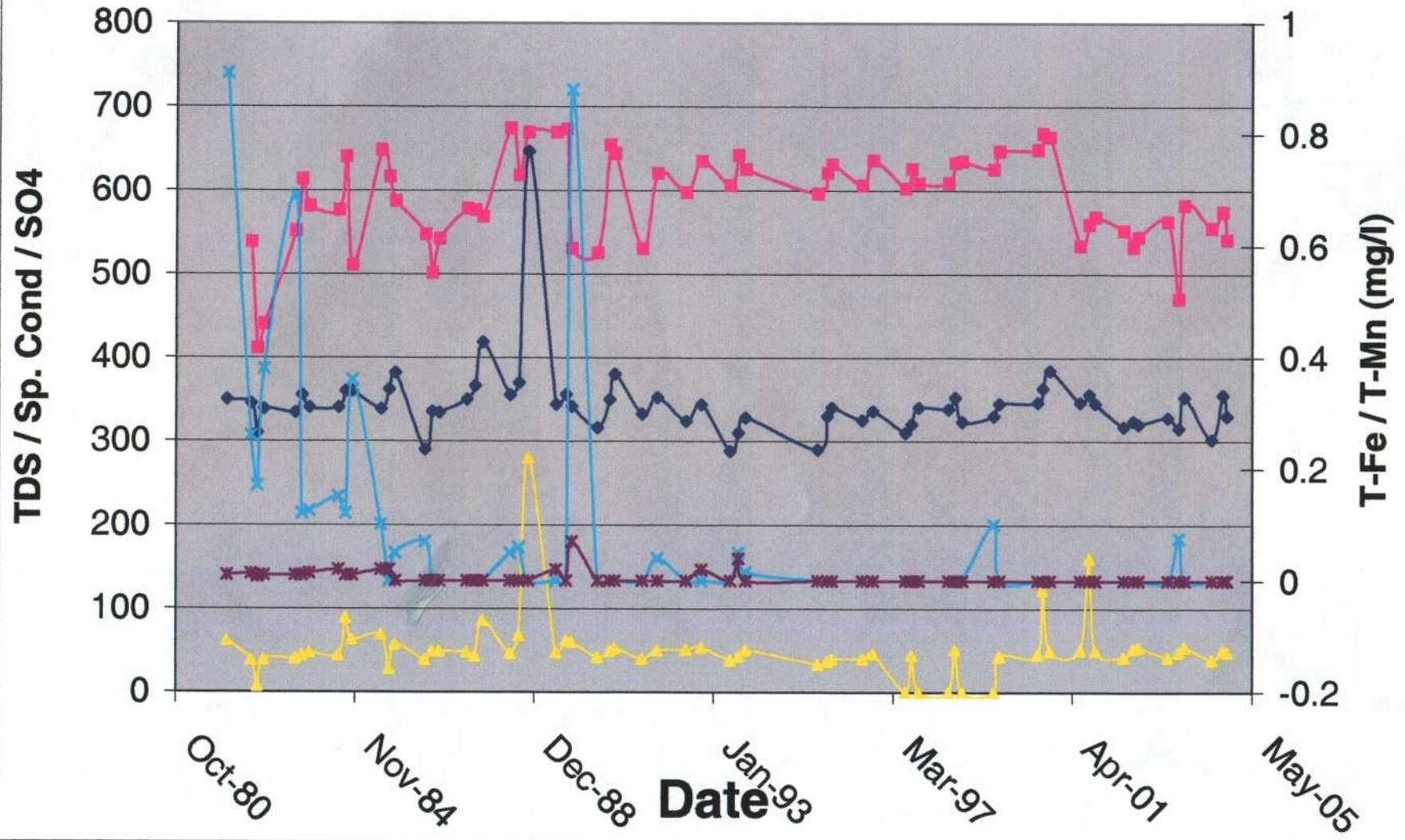
S15-3

—◆— TDS —■— Sp. Cond —▲— SO4 —×— T-Fe —*— T-Mn



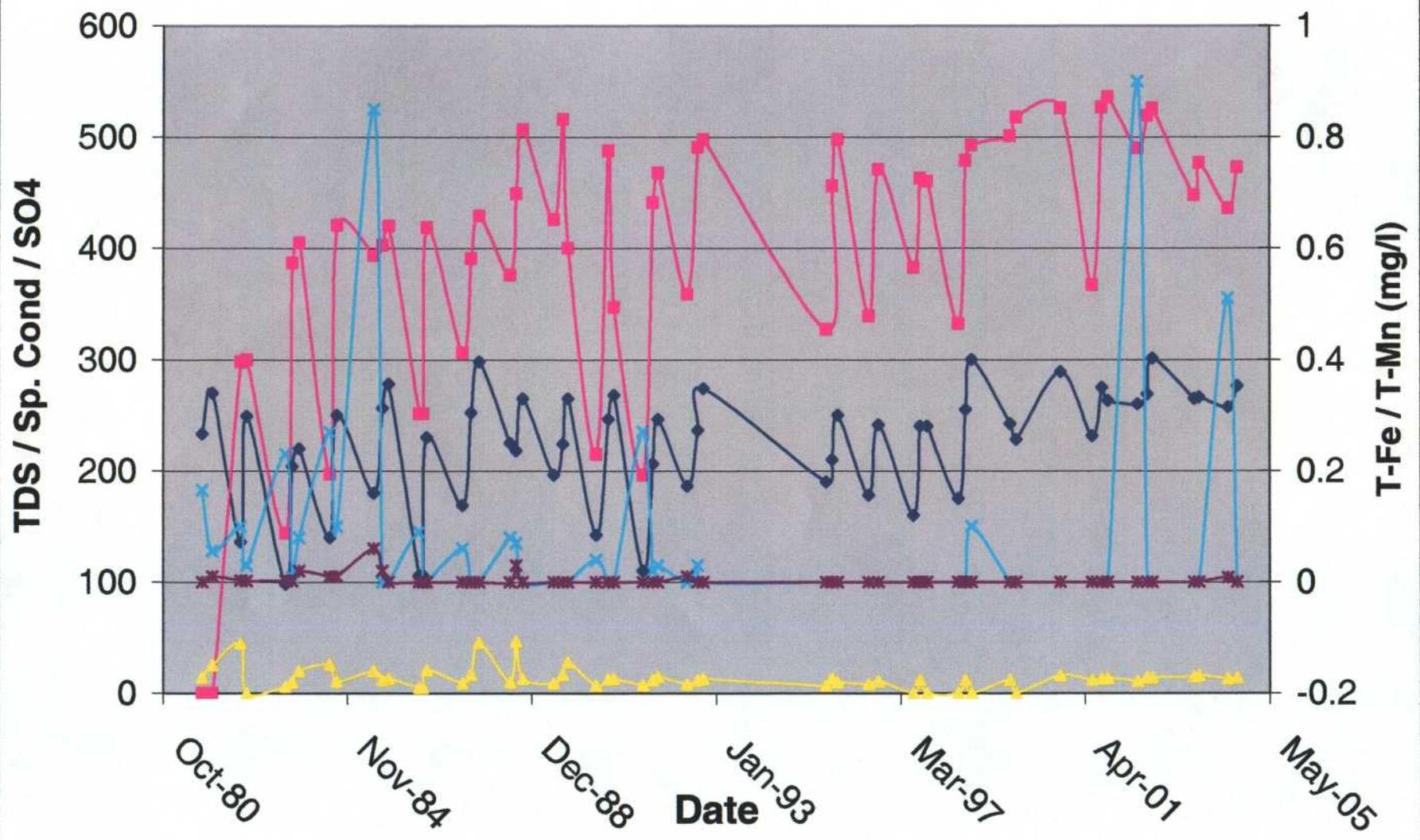
S13-2

◆ TDS ■ Sp. Cond ▲ SO4 × T-Fe * T-Mn



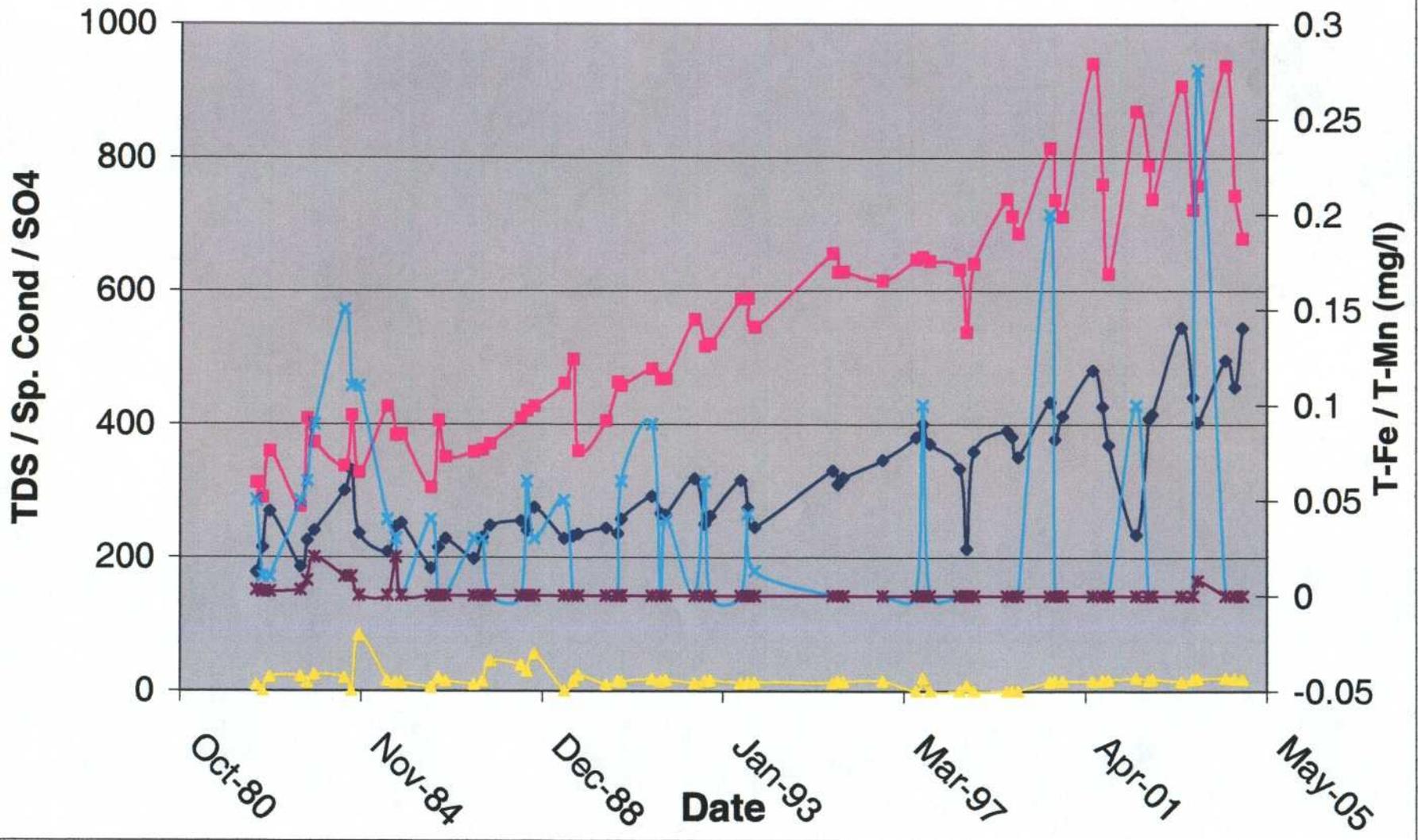
S14-4

—◆— TDS —■— Sp. Cond —▲— SO4 —×— T-Fe —*— T-Mn



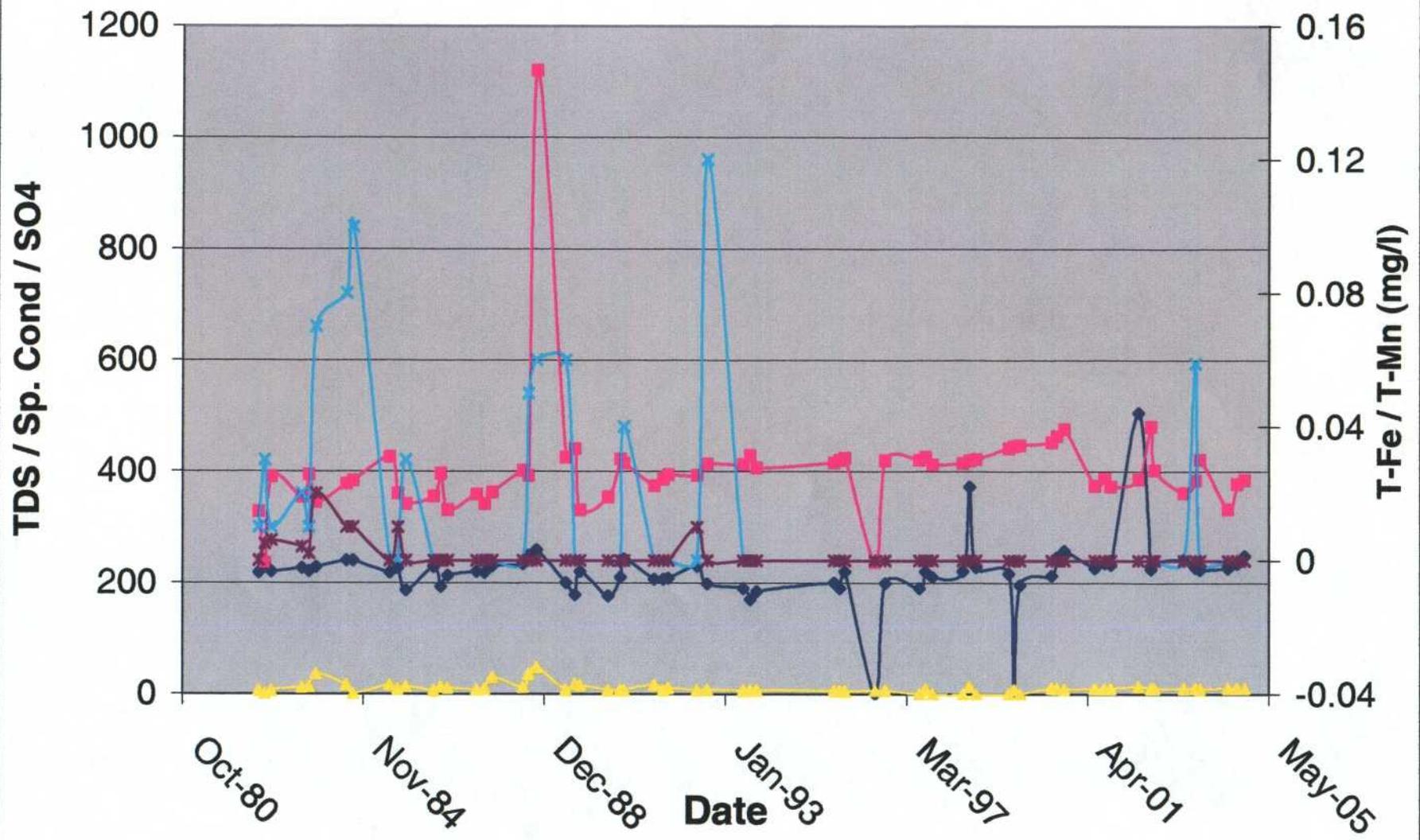
S22-5

◆ TDS ■ Sp. Cond ▲ SO4 × T-Fe * T-Mn



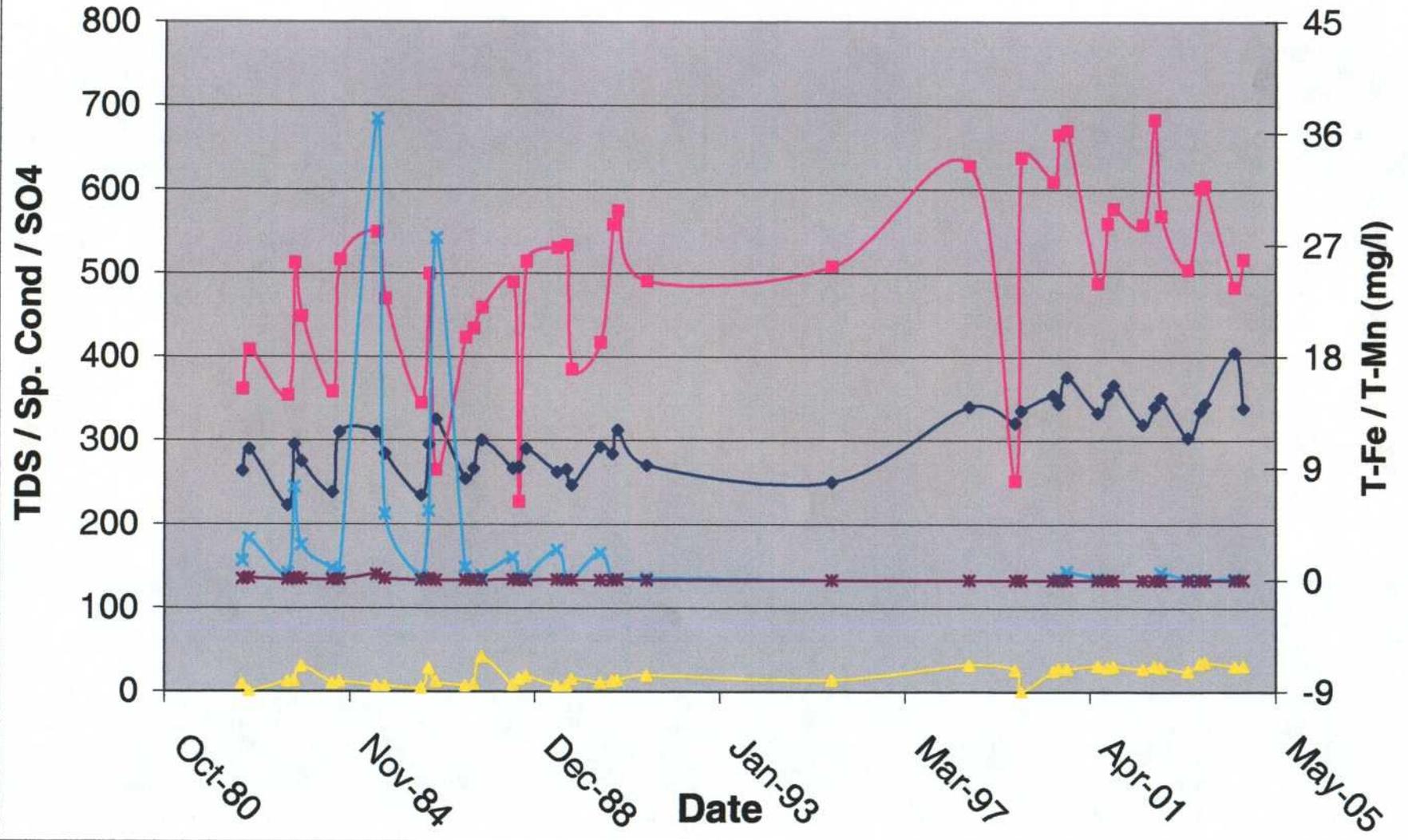
S22-11

—◆— TDS —■— Sp. Cond —▲— SO4 —×— T-Fe —*— T-Mn



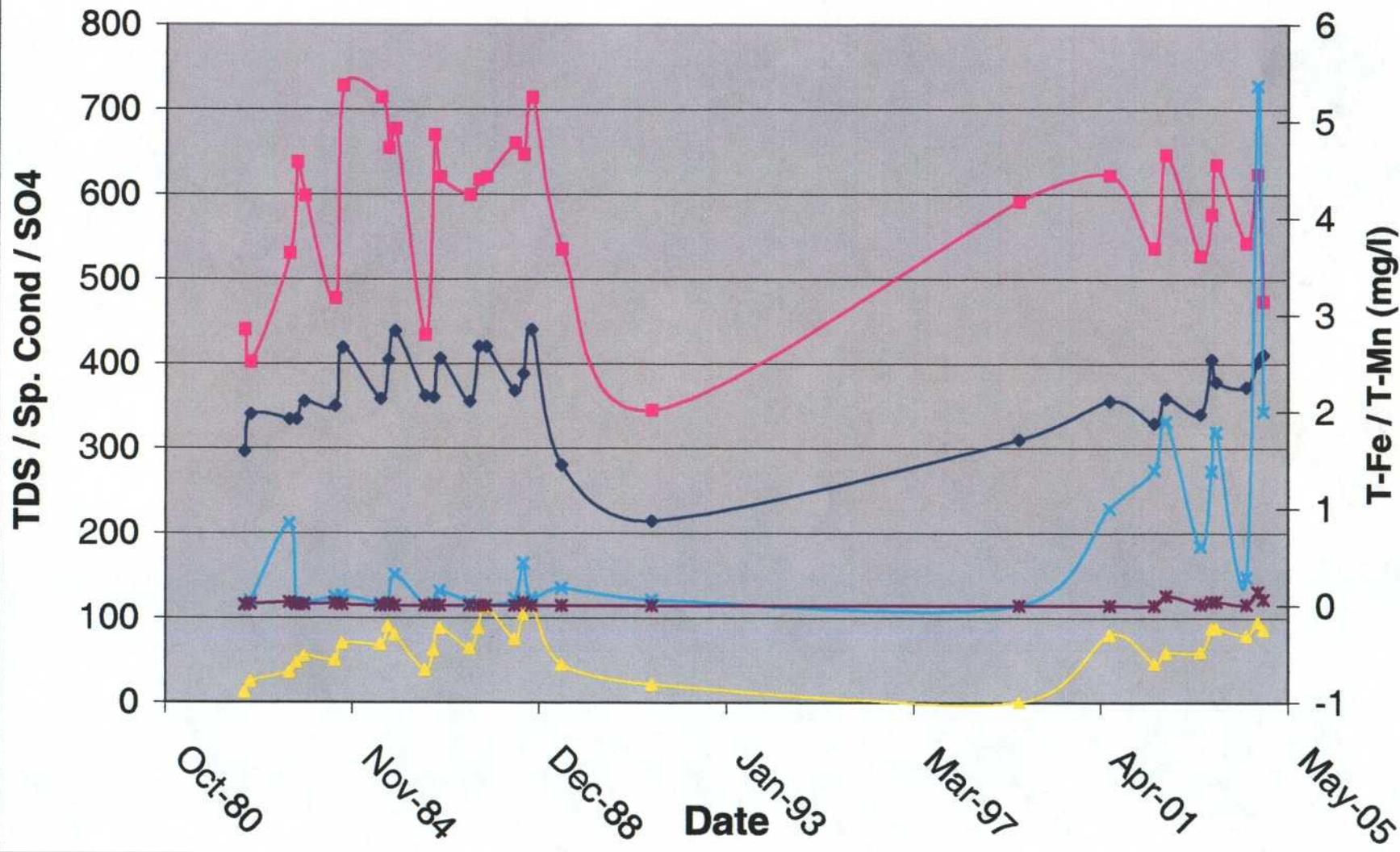
S23-4

Legend: TDS (black diamond), Sp. Cond (red square), SO4 (yellow triangle), T-Fe (cyan cross), T-Mn (purple asterisk)



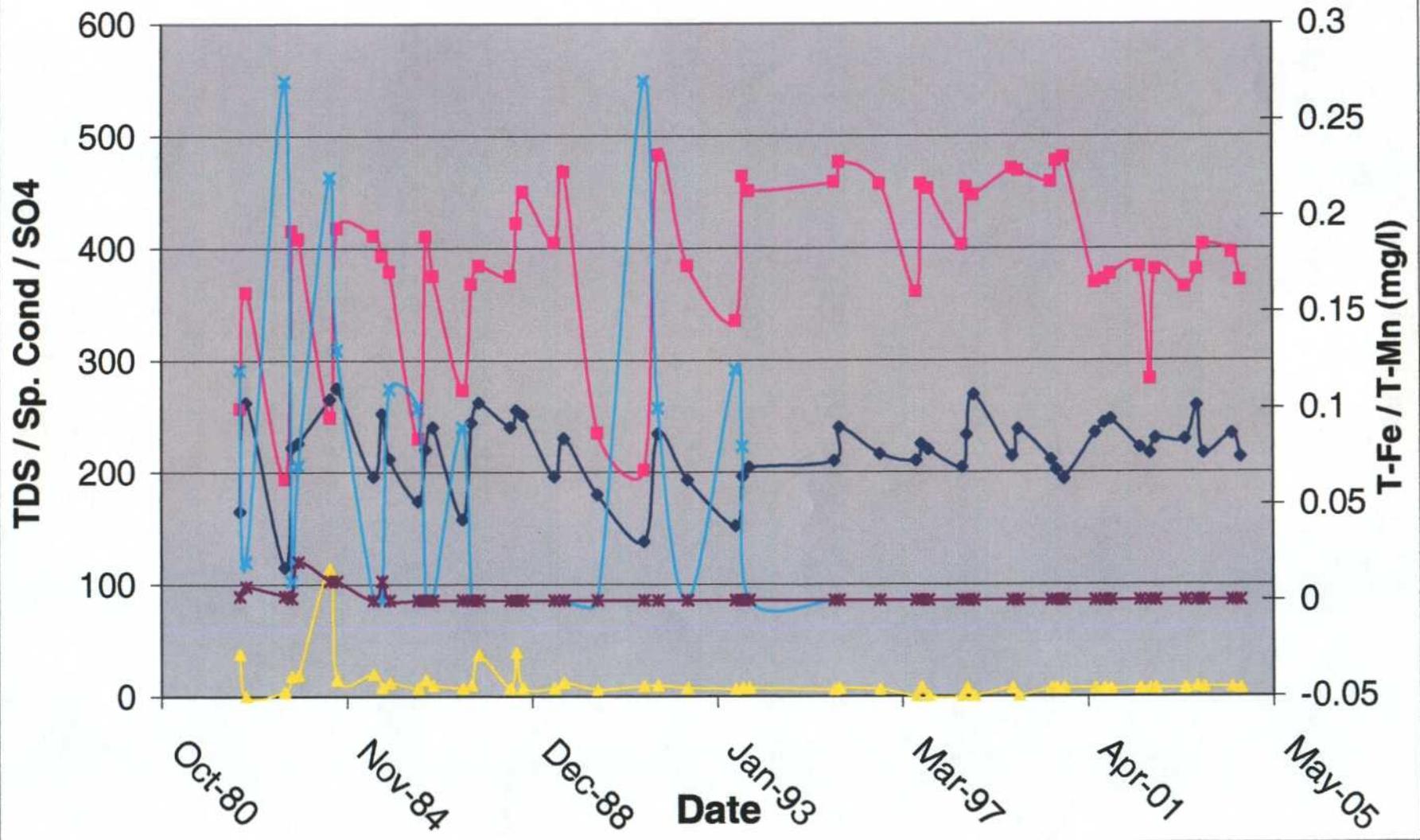
S24-12

◆ TDS ■ Sp. Cond ▲ SO4 × T-Fe * T-Mn



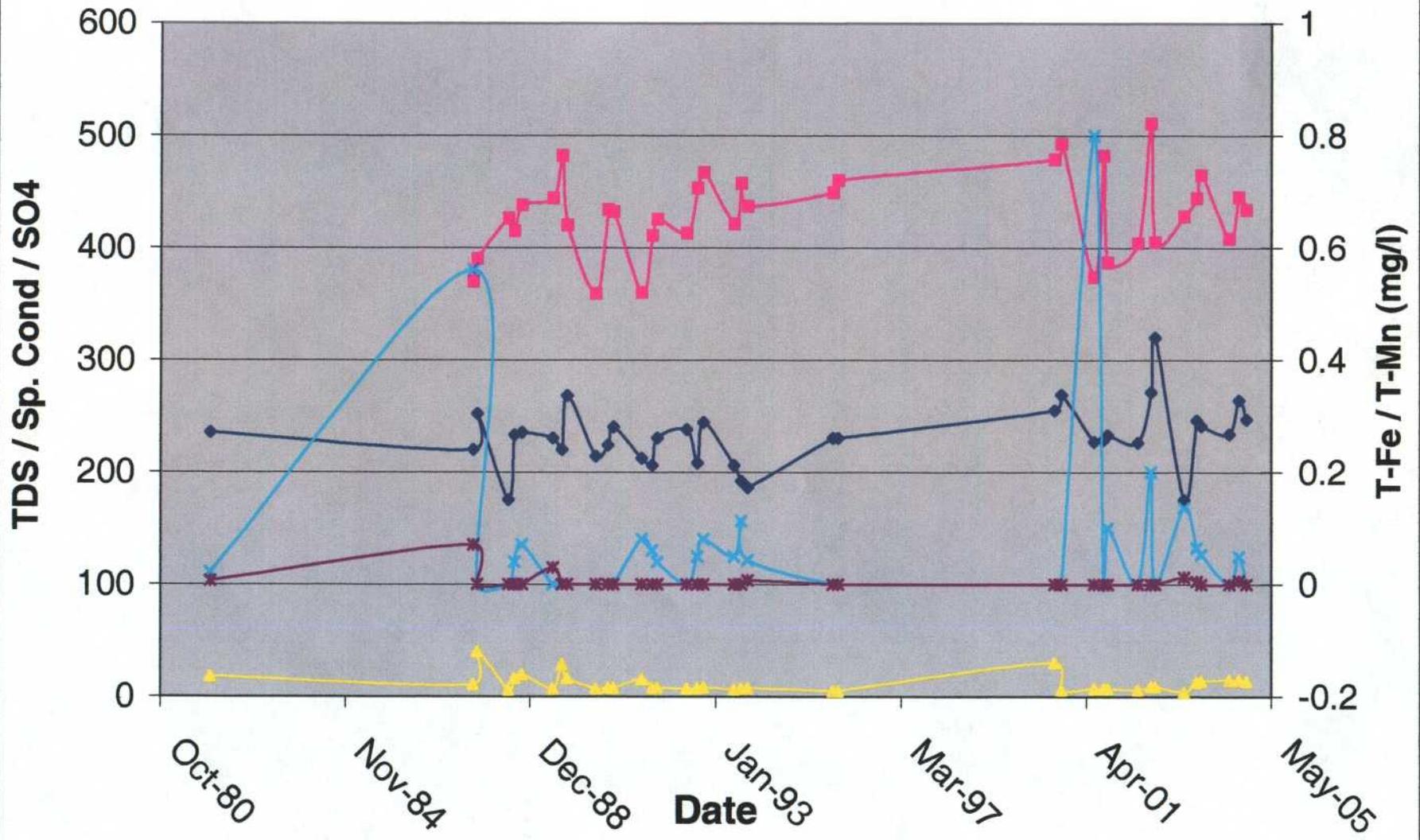
S26-13

—●— TDS —■— Sp. Cond —▲— SO4 —×— T-Fe —*— T-Mn

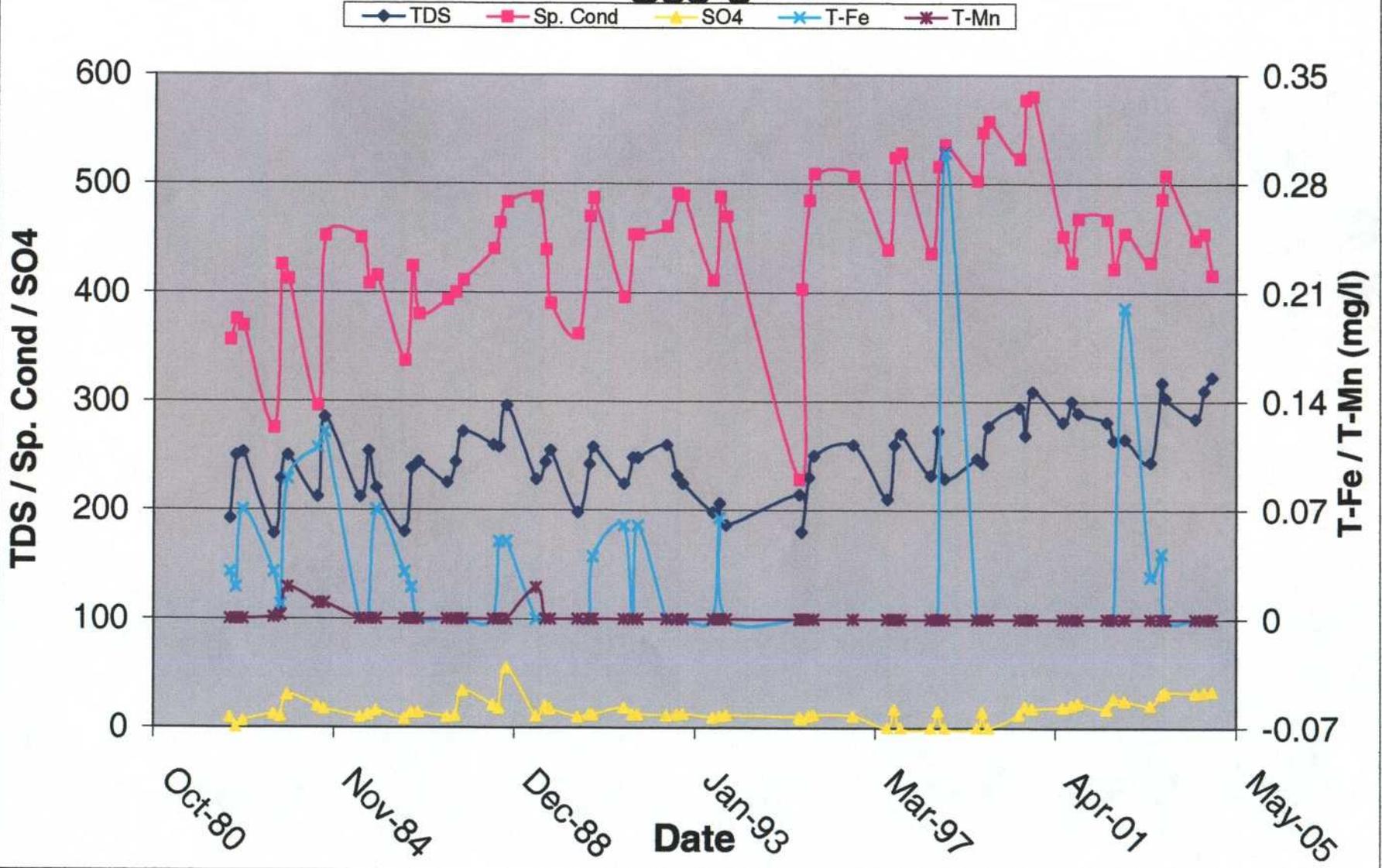


S34-12

◆ TDS ■ Sp. Cond ▲ SO4 ✕ T-Fe * T-Mn

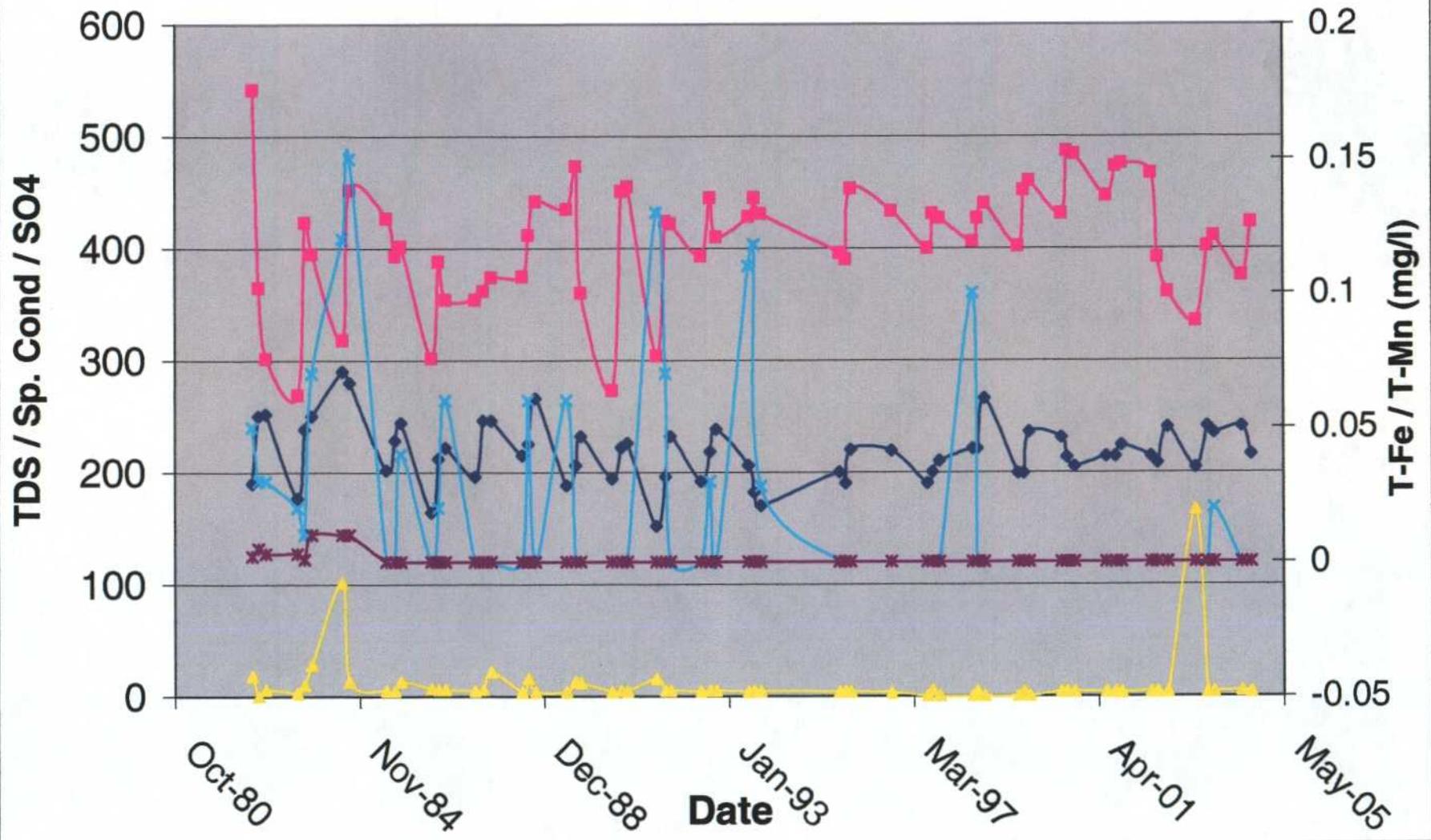


S35-8



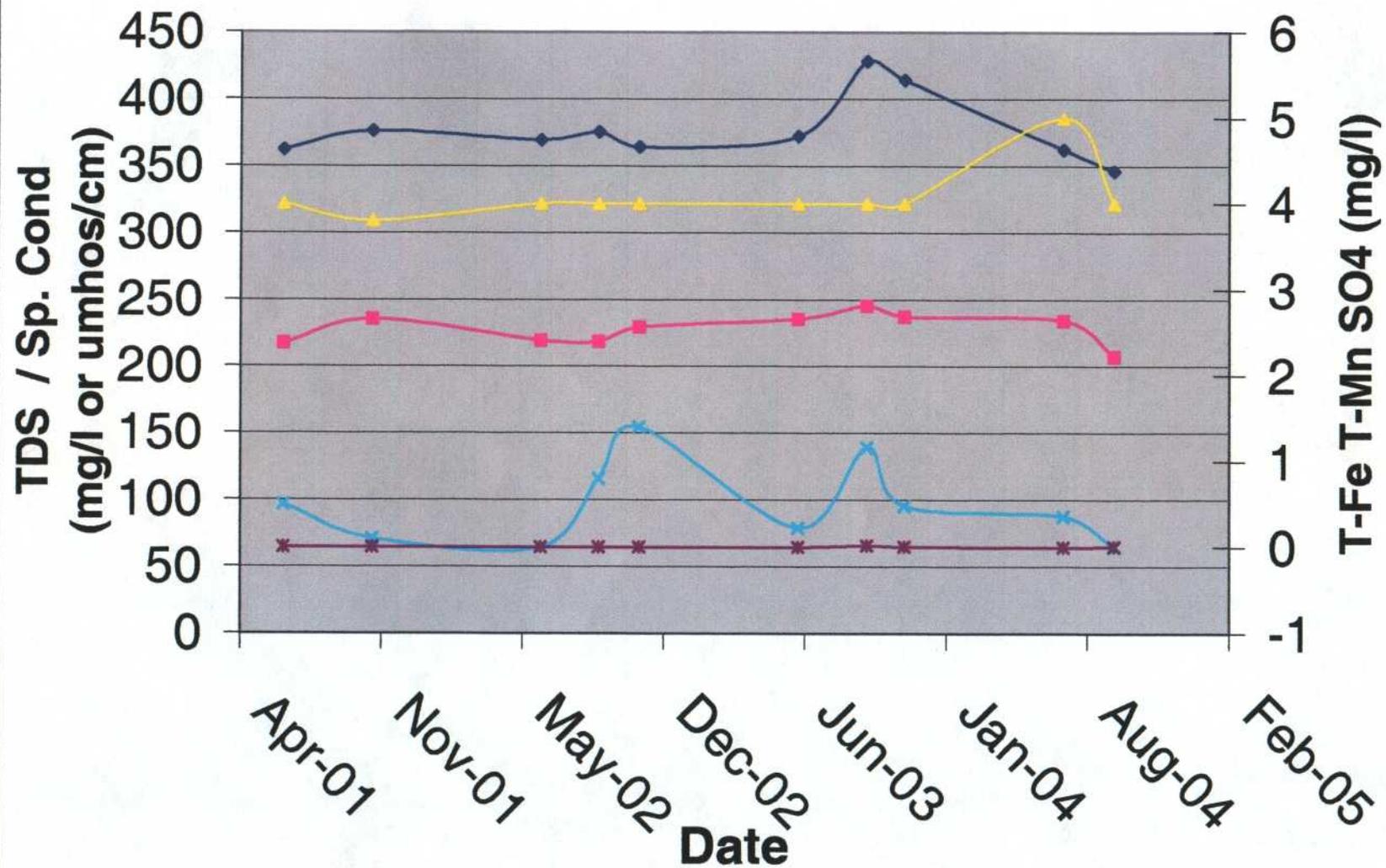
S36-12

—●— TDS —■— Sp. Cond —▲— SO4 —×— T-Fe —*— T-Mn



Sprina 2-413

◆ Sp. Cond
 ■ TDS
 ▲ SO4
 ✕ T-Fe
 ✱ T-Mn



Spring 3-290

