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TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

January 31, 2013

TO: Internal File

THRU: Priscilla Burton, Team Lead *PB lm 805*

FROM: Ken Hoffman, Hydrologist *KH*

RE: North Lease Permit Modification, Canyon Fuel Company, Skyline Mine, C/007/0005, Task #4208

SUMMARY:

The application from Canyon Fuel Co., LLC is for a 770.52 acre Significant Revision for the North Lease, BLM Coal Lease UTU-67939, of the Skyline Mine. The lease modification will add panels 13 – 15 Left, extending mining beneath Granger Ridge into Sections 25, 26 and 34 in T 12 S, R 6 E, refer to Dwg. 3.3-2. Drawing 1.6-1 shows the surface is owned by D. Euray Allred and Madelyn E. Allred Trust and the United States, managed by the U.S. Forest Service. This response to deficiencies received November 16, 2012 and original application received on May 2, 2012 (Task 4092), are the first electronic permit applications processed by the Coal Program.

This memo addresses the application's compliance with the hydrology (R645-301-700) section of the Utah Coal Mining Rules. The application contains a brief description of hydrology as well as a summary of spring and seep survey and baseline monitoring activities. The application covers water rights evaluation, baseline sampling, and hydrologic resource impacts. However the application includes numerous deficiencies. The application is not recommended for approval until the following issues are resolved:

R645.301.724.100 The application must include the location and ownership for the permit and adjacent areas of existing wells, springs and other ground-water sources, seasonal quality and quantity of ground water, and usage. Water quality descriptions will include, at minimum baseline information on, total dissolved solids or specific conductance corrected to 25 degrees C, pH, total iron, and total manganese. Ground-water quantity descriptions will include, at a minimum, approximate rates of discharge or usage. The amendment lacks the required monitoring parameters, sufficient data to show seasonal variation, and usage data. For