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State of Utah

DEPARTMENT OF NATURAL RESOURCES

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May 21, 2020

Gregg Galecki
Canyon Fuel Company, LLC
HC 35 Box 380
Helper, Utah 84526

Subject: North Lease Water Monitoring Reduction, Canyon Fuel Company, LLC, Skyline, C/007/0005, Task #6126

Dear Mr. Galecki:

The Division has reviewed your application. The Division has identified deficiencies that must be addressed before final approval can be granted. The deficiencies are listed as an attachment to this letter.

The deficiencies authors are identified so that your staff can communicate directly with that individual should questions arise. The plans as submitted are denied. Please resubmit the entire application.

If you have any questions, please call me at (801) 538-5350.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Christensen".

Steve Christensen
Coal Program Manager

SKC/sqs
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Technical Analysis and Findings

Utah Coal Regulatory Program

PID: C0070005
TaskID: 6126
Mine Name: SKYLINE MINE
Title: NORTH LEASE WATER MONITORING REDUCTION

Operation Plan

Hydrologic Ground Water Monitoring

Analysis:

The amendment does not meet the State of Utah R645 Hydrologic: Ground Water Monitoring.

The Permittee submitted an amendment to the Skyline Mine MRP to revise the ground and surface water monitoring program. The revisions include removing 17 water monitoring sites from the water monitoring program in the North Lease/North of Graben area, 13 of which are ground water monitoring locations. Included in the amendment, related to hydrology, are updates to section 2.3 of the MRP, Appendix A-1 Vol. 2 Water Monitoring Reduction Demonstration, and updates to Drawing 2.3.6-1 Locations of Hydrologic Monitoring Stations.

As part of the revision, the Permittee has proposed the removal of the following 13 spring locations: S10-1, S12-1, S13-7, S25-32, S26-1, WQ1-1, WQ1-39, WQ3-6, WQ3-26, WQ3-41, WQ3-43, WQ4-12, and WQ36-1. The Permittee has provided a history of each springs quality and quantity and a summary of its data since each location began being monitored as well as a map of the sites being removed in the document titled "Water Monitoring Reduction Mined-out Areas North of the Mine Facility". Figure 1-Water Monitoring Removal Locations is not clear as to which sites are being removed, and which sites will continue to be monitored within the North Lease Area. The Permittee has also included 2 graphs for each of these monitoring sites; one to compare flow to the Palmer Hydrologic Drought Index, and the other to demonstrate quality by plotting Total Iron (T-Fe), Total Manganese (T-Mn), Total Dissolved Solids (TDS), and Sulfate (SO₄). Although it is described in the first summary as to what the graphs represent, the legends on some of these graphs are not legible and have been cut off due to formatting issues. In addition to the data presented, the Permittee has provided valid justification as to why each of these locations should be removed from the current water monitoring program.

Deficiencies Details:

The amendment does not meet the State of Utah R645 requirements for Hydrologic: Ground water Monitoring. The following deficiency must be addressed prior to final approval:

R645-301-731.200 There are a number of errors in the Figure 1 Water Monitoring Removal Locations in the "Water Monitoring Reduction Mined-Out Areas North of the Mine Facility" document, and the graphs associated with each of the water monitoring sites. See the above analysis for details.

khinton

Hydro Surface Water Monitoring

Analysis:

The amendment does not meet the State of Utah R645 Hydrologic: Surface Water Monitoring.

The Permittee submitted an amendment to the Skyline Mine MRP to revise the ground and surface water monitoring program. The revisions include removing 17 water monitoring sites from the water monitoring program in the North Lease/North of Graben area, 4 of which are surface water monitoring locations. Included in the amendment, related to hydrology, are updates to section 2.4 of the MRP, Appendix A-1 Vol. 2 Water Monitoring Reduction Demonstration, and updates to Drawing 2.3.6-1 Locations of Hydrologic Monitoring Stations.

As part of the revision, the Permittee has proposed the removal of the following 4 stream locations: CS-19, CS-21, CS-25 and C-26. The Permittee has provided a history of each streams quality, except stream CS-26, and quantity and a summary of its data since each location began being monitored as well as a map of the sites being removed in the document titled "Water Monitoring Reduction Mined-out Areas North of the Mine Facility". Figure 1-Water Monitoring Removal Locations is not clear as to which sites are being removed, and which sites will continue to be monitored within the North Lease Area, The Permittee has also included 2 graphs for each of these monitoring sites; one to compare flow to the Palmer Hydrologic Drought Index, and the other to demonstrate quality by plotting Total Iron (T-Fe), Total Manganese (T-Mn), Total Dissolved Solids (TDS), and Sulfate (SO₄). Although it is described in the first summary as to what the graphs represent, the legends on some of these graphs are not legible and have been cut off due to formatting issues. In addition to the data presented, the Permittee has provided valid justification as to why each of these locations should be removed from the current water monitoring program. Table 2.3.7-3 has been updated to include number of total spring locations being monitored, but the Eccles Canyon/Mud/Fish Creek Drainage Stream Stations needs to be updated to include the removal 4 stream locations reducing the stations from 15 to 11.

Deficiencies Details:

The amendment does not meet the State of Utah R645 requirements for Hydrologic: Ground water Monitoring. The following deficiency must be addressed prior to final approval:

R645-301-731.224 Justification for the removal of the stream monitoring site CS-26 must be provided to the Division. This justification must include an analysis of the data including quality and not just quantity.

R645-301-731.200 There are a number of errors in the Figure 1 Water Monitoring Removal Locations in the "Water Monitoring Reduction Mined-Out Areas North of the Mine Facility" document, the graphs associated with each of the water monitoring sites and in Table 2.3.7-3. See the above analysis for details.

khinton

Maps Monitoring and Sampling Locations

Analysis:

The amendment meets the State of Utah R645 requirements from Maps, Monitoring, and Sampling Locations.

The Permittee has submitted an updated Drawing 2.3.6-1, Location of Hydrologic Monitoring Stations, to include the removal of the proposed 17 water monitoring sites within the North Lease/North of Graben area.

khinton