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DEPARTMENT OF NATURAL RESOURCES

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Division of Oil, Gas and Mining

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July 22, 2020

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

Subject: Conditional Approval of North Lease Water Monitoring Reduction, Canyon Fuel Company, LLC, Skyline Mine, C/007/0005, Task #6148

Dear Mr. Galecki:

The above-referenced amendment is approved conditioned upon receipt of 2 clean copies prepared for incorporation. Please submit these copies by August 21, 2020. Once we receive these copies, final approval will be granted. A stamped incorporated copy of the approved plans will also be returned to you at that time, for insertion into your copy of the Mining and Reclamation Plan.

With the conditional approval, the Division of Oil, Gas and Mining (DOG M) will not requiring 3rd quarter sampling/data collection for the water monitoring sites that have been removed with this amendment.

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

Sincerely,

Steve Christensen
Coal Program Manager

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Technical Analysis and Findings

Utah Coal Regulatory Program

PID: C0070005
TaskID: 6148
Mine Name: SKYLINE MINE
Title: NORTH LEASE WATER MONITORING REDUCTION

Summary

This is a response to deficiencies from Task ID 6126 addressing Skyline Mine's North Lease Water Monitoring Reduction.

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Operation Plan

Hydrologic Ground Water Monitoring

Analysis:

The application meets the State of Utah R645 requirements for Groundwater Monitoring.

The Permittee has designated the following 13 springs to be discontinued from their water monitoring program: 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. To justify the removal of these ground water monitoring sites from the water monitoring plan, locations, maps and descriptions of the nearest mining are included in addition to Appendix A-1 Water Monitoring Reduction. Appendix A-1 provides a quantity and quality analysis of data collected at each of the sites. Of the springs proposed for discontinued monitoring, the following 8 have been undermined: S10-1, S13-7, S12-1, WQ3-6, WQ3-43, WQ3-41, WQ36-1, and S26-1. These sites are located above areas that were mined predominantly between 2005-2017. S10-1, S13-7 and S12-1 have been monitored since 1982 through 2019. WQ3-6, WQ3-43, WQ3-41 have been monitored since 2002 through 2019. WQ36-1 has been monitored from 2008 through 2019 and S26-1 has been monitored from 2012 through 2019. The other 5 springs are outside of the mine plan and there are no plans to mine under or near these locations in the future.

A table including field pH, Specific Conductivity, Flow, TDS, Total Iron Total Manganese and Sulfate for each location have been included in Appendix A-1. In addition to data in the table 2 graphs for each site are provided in Appendix A-1. One graph is to compare flow rates to the Palmer Hydrologic Drought Index, while the other graph provides an indication of water quality by plotting Total Iron, Total Manganese, Total Dissolved Solids and Sulfate. This data is included in the amendment to support the conclusion there these springs were not impacted by mining activities.

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Hydro Surface Water Monitoring

Analysis:

The application meets the State of Utah R645 requirements for Surface Water Monitoring.

The Permittee has designated the following streams to be discontinued from their monitoring program: CS-19, CS-21,

CS-25, and CS-26. Table 2.3.7-1 in the MRP has been updated to include the removal of all sites included in justification document, Appendix A-1 Water Monitoring Reduction. Appendix A-1 gives monitoring data analysis of the four stream locations including quantity and quality. CS-19, CS-21 and CS-25 were put into the plan to monitor Woods Canyon and the downstream impacts from mining. CS-19 has been monitored since 2002 while CS-21 was initially downstream and monitoring started in 2003, with mine plan changes, CS-25 was put into place in 2010 to collect more accurate data. The nearest longwall panel was undermined from December 2014 through May 2015 with no noticeable impacts to monthly or quarterly data. CS-26 was added in 2012 as a downstream sample location when the Lease UTU-67939 was extended. The site was approximately 2 miles downstream of mining and provided minimal flow data from being dry nine of the twenty three times monitored.

Tables, graphs and flow data were provided in Appendix A-1 as part of the amendment to support the conclusion that these streams were not impacted by mining activities.

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Maps Monitoring and Sampling Locations

Analysis:

The application meets the R645 requirements for Maps Monitoring and Sampling Locations.

Plate 2.3.6-1_Rev. 19 in Chapter 2 of the Skyline MRP has been updated to reflect the proposed changes to the groundwater and surface water monitoring sites. The map appears to have been updated correctly and corresponds with the monitoring plan in Chapter 2 of the Skyline MRP.

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