



# State of Utah

DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF OIL, GAS AND MINING

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December 8, 1988

TO: John Whitehead, Permit Supervisor

FROM: Tom Munson, Reclamation Hydrologist *TM*

RE: Review of Plateau's Water Quality Data Modification, Cyprus-Plateau Mining Company, Starpoint Mine, ACT/007/006, Folder #2, Carbon County, Utah

## Synopsis of Proposal

The initial plan was received on October 20, 1988 to modify their sampling program for surface and ground water sampling. Since it involved a significant amount of data manipulation, a copy of their data was requested on computer disk. An analysis of this data was performed to determine the validity of their request.

## Analysis

The operator requested that most metals and nutrients be dropped, based on approximately seven years of data. After a close examination of data, it was determined that the data was not adequate to define the existence or absence of the parameters for the stations currently being sampled. The analysis submitted encompassed all the data collected for every station ever sampled at Plateau, but did not differentiate completeness of baseline data collection for each station.

Therefore, any baseline analysis completed on a station-by-station basis did not yield similar results to Plateau's analysis. For example, many of the parameters recommended for deletion have never been collected or have only been collected for one year at many of the stations. It is the policy of the Division to have at least two years of baseline data on each station before an analysis can be performed. This analysis must include the entire suite of data for each station. A close analysis of the data revealed many inadequacies regarding data acquisition for both frequency and parameters. The Division, therefore, cannot make a determination at this point in time because of an inadequate data set on many stations.

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Recommendation

The request be denied, based on inadequate data collection to date, to assess the validity of the operator's proposal. It will be reassessed when adequate data has been collected for all currently monitored stations and on a station-by-station basis only.

djh  
AT5/33-34