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file 007/006 #2

CYPRUS
Plateau Mining

An Affiliate of Cyprus Coal Company
P.O. Drawer PMC
Price, Utah 84501
(801) 637-2875

February 13, 1989

Mr. John Whitehead
Division of Oil, Gas and Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

Re: **Water Monitoring Requirements**

Dear Mr. Whitehead:

After our meeting last week regarding water monitoring, two additional issues have been brought to my attention.

The attached memorandum discusses dissolved oxygen sampling and settleable solids sampling requirements. Please consider these two requirements in your evaluation of the monitoring requirements.

It is our position that neither of these constituents should be monitored for at CPMC.

Respectfully,

Ben Grimes
Sr. Environmental Engineer

BG:sd

Attachment

File: ENV 2-5-2-16-26
Chrono: BG890202

INTEROFFICE MEMORANDUM

TO: B.A. Grimes
Cyprus Plateau Mining Corp.

DATE: February 9, 1989

FROM: J.G. Nalven

SUBJECT: **Star Point Mine:**
Hydrologic Monitoring Program

J.G. Nalven/clr

A couple of issues were not addressed in our February 8, 1989, meeting with the Utah Department of Oil, Gas and Mining (DOGM) personnel concerning the hydrologic monitoring program at the Star Point Mine. The issues were: 1) dissolved oxygen and 2) settleable solids. The following information should be transmitted to DOGM so that they can include it in their analysis of the Star Point hydrologic monitoring program.

Dissolved oxygen has recently been added to the list of constituents to be measured at the surface water monitoring locations. This constituent is not measured at any of our western mine sites. It was formally measured at our Cyprus Yampa Valley Coal Company operations, but was removed because there was no justification for measuring it. Dissolved oxygen is normally only monitored when there are discharges that will either: 1) add oxygen demand to a stream (BOD and COD) and 2) when a discharge will significantly raise the water temperature. The only station that will be directly affected by a permitted discharge is on Mud Water Creek (51MW). There is no evidence that the discharge will significantly raise stream temperatures. During the critical summer months the discharge will have a lower temperature than the stream. No BOD and very little, if any, COD will be discharged from the mine. Therefore, there is no justification for monitoring dissolved oxygen in most of the stream reaches and very little, if any, justification for monitoring it in Mud Water Creek.

Settleable solids are being monitored at the surface water sites. There is no stream standard for settleable solids. It is solely used to judge the performance of sediment ponds and is measured at the pond discharge. This constituent is not measured in-stream at any of our western mine sites. Normal perennial streams will not have detectable levels of settleable solids except during very high run-off events. The measurement of in-stream settleable solids is not appropriate for a normal monitoring program. It is only appropriate for the compliance monitoring of sediment ponds and their influent and for storm-event monitoring programs.

JGN/clr

ENCLOSURE

cc: G.A. Trabits