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State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

355 West North Temple
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Mine File

September 25, 1990

Mr. Joe Gates, Chief
Investigations Section
Water Resources Division
U. S. Geological Survey
Room 1016, Administration Building
1745 West 1700 South
Salt Lake City, Utah 84104

Joe
Dear Mr. Gates:

Re: Ground Water Investigation, Memorandum of Agreement 90-2677 for the Star Point Mine, ACT/007/006, Cyprus Plateau Mining Corporation, Carbon County, Utah #2

Pursuant to our telephone conversation, I am enclosing a file memo that summarizes the Division's position with respect to the requirement for drilling a monitoring hole in 1992, to support the above-referenced study.

Although not stated in the file memo, I agree that the data to be provided by such a hole could provide valuable insight into the recharge of perched aquifers in the geologic and temporal situations of the proposed test. My reason for not supporting the need to drill is simply lack of a regulatory requirement for such a hole coupled with risk of mechanical failures in drilling at the proposed site.

I have attempted to summarize our most recent meeting in the memo. If there are corrections that you feel would help summarize the meeting, please feel free to provide them and I will redraft the memo and recopy to USGS and Cyprus Plateau.

I believe the study to date is proving to be a valuable one, and I appreciate the flexibility and willingness of the USGS to continue the study for another year without the added incentive of the proposed 1992 surface drill hole.

I will need to revise the MOU between Cyprus Plateau and DOGM to accommodate work to be performed between September 30, 1990 and September 30, 1991.

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Mr. Joe Gates
September 25, 1990

It would be helpful to me if you could prepare a short objectives and scope of work to be accomplished document that would set the tone for my modification of the MOU. Feel free to discuss this with Ben Grimes or me if that would be helpful.

Sincerely,


Lowell P. Braxton
Associate Director, Mining

vb
Enclosure
cc: B. Grimes, Cyprus Plateau Mining Co.
T. Munson
MI72/8&9



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September 14, 1990

TO: File

FROM: Lowell P. Braxton, Associate Director, Mining *LPB*

RE: Ground Water Investigation, Memorandum of Agreement 90-2677 for the Star Point Mine, ACT/007/006, Cyprus Plateau Mining Corporation, Carbon County, Utah

On September 11, 1990, participants in the above Memorandum of Agreement (MOA) met and reviewed status of the project to date. Cyprus Plateau Mining Corporation was represented by Ben Grimes, the USGS by Joe Gates, Cecil Slaughter, Geoff Freethey, and DOGM by Tom Munson and Lowell Braxton. Cecil discussed work conducted since June of 1990, and indicated an initial draft report on activities conducted prior to June was scheduled for late September, 1990.

The need for and the anticipated results of a surface monitoring hole proposed for 1992 was discussed. The hole is not required by regulation or permit stipulation, but successful completion would have allowed post subsidence monitoring of ground water recharge in a perched aquifer, that has been one focus of the study being conducted under the MOA.

Ultimately, shared costs of the drill hole could be a subject of contention to the participants in the MOA, however, discussion on September 11 focused on the technical merits of the hole:

1. The hole would be drilled in an area impacted by the subsidence effects of mining two coal seams.
2. Probability of mechanical problems during drilling (loss of circulation and bore-hole wall stability) is anticipated to be high due to drilling in subsidence-fractured rock.
3. The only location discussed is not accessible to truck mounted drilling equipment. Although not discussed in detail, helicopter-supported drilling rigs do not often have reverse circulation capabilities or aerated mud drilling capabilities that would enhance success in drilling fractured rock targets.
4. Juxtaposition of subsided workings and over burden down dip from the proposed drill site raises a question of the potential for water buildup in the targeted aquifer within the timed scope of the study (1993).

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Memorandum to File
ACT/007/006
September 14, 1990

The Division was charged with making a decision with respect to drilling the hole. Based on the potential for failure cited in numbers 2, 3, and 4, above, the decision is to not drill the hole. The USGS should continue with work in progress, including documentation of work completed to date, drilling and installation of monitoring equipment in an additional underground drill hole and surface mapping of fractures. A proposal for work to be conducted by the USGS after October 1, 1990 should be presented to DOGM and Cyprus Plateau. Both DOGM and Cyprus Plateau support the ongoing study without the drilling of the surface monitoring well.

vb
cc: J. Gates, USGS
B. Grimes, Cyprus Plateau Mining Corp.
T. Munson
MI78/110&111