



Cyprus Plateau Mining Corporation  
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December 10, 1992

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DIVISION OF  
OIL GAS & MINING

Ms. Pamela Grubaugh-Littig  
Division of Oil, Gas & Mining  
355 West North Temple  
3 Triad Center, Suite 350  
Salt Lake City, Utah 84180-1203

Dear Ms. Littig,

**Re: Division Letter November 11, 1992 - Requirements**

This letter is in response to your letter of Nov. 11, 1992 and a request by Bill Malencik in his inspection report dated Nov. 11 & 12, 1992 for a permit amendment to revise the water monitoring plan.

I will repeat here the text of each item in your letter and then respond to them.

Due to the fact that the BLM did not witness the completion of exploration and the air shaft, it will be necessary to submit the final as-builts for the Gentry Mountain air shaft for inclusion in the PAP.

Our records show that the BLM and the Forest Service were kept informed on every step of the exploration, air shaft installation and the monitoring well projects. They had representatives onsite on several occasions to witness the work. Unfortunately, the projects were completed in very trying weather and road conditions and the BLM representatives declined to travel to the site to inspect every detail of the work. We even provided a helicopter on at least two occasions for the BLM and Forest Service personnel to visit the sites.

The air shaft project is not complete at this time because of weather and ground conditions. The steel casing is in place and the annulus has been partially cemented but, the surface work is not complete and will not be completed until next spring. A drawing of the currently completed work is enclosed but, bear in mind that as-builts cannot be made until the project is completed.

It will also be necessary to submit the finalized information (completion data) for the exploration holes.

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Only one exploration hole was completed during 1992, hole PP10-1. This hole is the one selected for installation of a ground water monitoring well (No. 92-10-1) as discussed with Tom Munson, and Ken Wyatt on September 1, 1992 in the Division's office, and as shown on Map 728b as a potential in-mine well located in Little Park Canyon. During the September 1 meeting, we discussed this location for either a surface well or an in-mine well. The enclosed Monitor Well 92-10-1 schematic shows details of the strata as well as the monitor well.

Additionally, the BLM told the Division that one of the holes was converted to a water monitoring hole, which the Division was not aware of until that time. The location of this hole, the completion records, and what information will be gathered from this hole, which the Division assumes will be for baseline information, must be submitted to the Division by December 11, 1992, to update the PHC document.

David Hansen of Hansen, Allen and Luce and I discussed this well and it's location with Tom and Ken on September 1, 1992. The approximate location was shown on Map 728b (within the 600' square) which was a part of the PHC revision. The actual location is shown on the enclosed copies of Map 728b (within the square). Due to ongoing geologic work, the exact location of the exploration hole/well had to be selected at the last minute.

The enclosed well schematic shows details of the well completion. The well was permitted through the State Engineer's office (approval attached).

As discussed with Tom and Ken, the well will be used for ground water occurrence information. The well has been added to the monitoring plan as shown on Table 731.211a (copies enclosed). Due to the depth of the well, no water quality samples will be taken, but a pressure transducer will be installed in early January to monitor the water level during the remainder of the winter. During the summer season, the water level will be obtained by standard water well level indicator methods since it would be risky to leave an expensive transducer and data logger on public land.

In the future, it is requested that Cyprus Plateau Mining Corporation notify the Division within 30 days of drilling a water monitoring hole, as to the exact location where the hole will be drilled. Additionally, it

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is requested that Cyprus Plateau Mining Corporation submit detailed information, to be included in the PHC, as to how these water monitoring holes will be installed and/or completed, tested and monitored.

Additional monitoring wells were committed to on page 728 - 25 in the original PHC revision dated May, 1992 which was submitted to the Division on May 15, 1992. Additionally, clarification was presented on pages 2, 3 and 4 of 6 of a cover letter accompanying revisions to the PHC document submitted to the Division on September 25, 1992. We consider the above mentioned PHC submittal and the meeting of September 1 adequate notification to the Division that the monitoring well was to be installed. In the future, we will make additional efforts to notify the Division when wells are scheduled. Keep in mind that drilling crews usually work around the clock, in all weather conditions, and it is not always pleasant to visit drill sites, nor is it Plateau's policy to regularly provide helicopter service to the sites. As evidenced by the BLM during this year's drilling project, they declined to monitor every detail of the project. We were not aware of the requirement for Division personnel to be on-site at well projects.

We believe it is not necessary to include in the PHC or the permit details of monitoring well designs since the construction is regulated by the State Engineer and the wells have to be certified by a certified well driller as per State standards. Our installations have been and will continue to be in compliance with state standards. Well construction will be similar to the design of well 92-10-1 (copy enclosed).

Testing will be by standard methods<sup>what methods</sup> that may vary depending on situations at each well; for water level and quality monitoring, drawdown type testing is not critical and is not done. Selected in-mine wells have been tested for drawdown as discussed in the PHC submittal of May 15, 1992. Slug tests have also been done on at least one of the in-mine wells to help determine rock permeability.

Monitoring of wells will be by standard methods. Water quality monitoring will be conducted at one or more of the future in-mine wells to be installed in Castle Valley Ridge as mining progresses north. These wells will be of shallower depth than well 92-10-1 and will be more conducive to monitoring for quality on a regular basis than well 92-10-1.

The attached revised Table 731.211a reflects the addition of well 92-10-1 as well as other revisions as follows:

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Birch Spring and Big Bear Spring- Added in 1992 to reflect the PHC research of potential impacts. Even though in our opinion, there is very little potential for impacts to these springs, we felt it is best for our protection to monitor them in case of impacts. Mining in the area of the springs we believe may have some potential for impacts and we want to have data in any event.

Gentry Ridge Mine Flow- Water being removed from the Gentry Ridge area is measured by a meter. Flows will be measured and sampled according to the schedule shown until mining is completed in the area.

Well 92-10-1- Added starting in January, 1993. This surface well will have the same schedule as well 86-26-6, it is only accessible during the summer months. We will use a helicopter in January to take the initial water level and install a pressure transducer to be used until about June. In June, the transducer will be removed since it would be risky to leave this expensive equipment on public land during the summer. The transducer and data logger will provide water level data for the initial few months. The well was completed in late October and has been left to stabilize while we are waiting for delivery of the transducer and data logger.

Well 86-18-2- A request was made to the Division in August, 1990 to delete this well from the program because it was destroyed by mining and is no longer useable. For some reason, it was added back on the table during the permit renewal process recently. We are asking again to remove it from the program.

Wells P92-01C-WD, P92-02-WD, P92-03-WD & P92-04-WD- These in-mine wells have been added starting in 1992 to monitor ground water levels and quality as shown.

Bill Malencik addressed wells 86-18-2 and 86-26-6 in his inspection report dated Nov. 11 & 12, 1992 on page 2 of 6. Well 86-18-2 has been addressed above. Well 86-26-6 remains on the monitoring schedule and is not the well that silted in as stated by Bill. Well 86-26-4, a shallow ground water monitoring well very near well 86-26-6 is the well that silted in and it was also requested to be deleted from the monitoring list in August, 1990. It is not shown on the currently approved Table 731.211a to our knowledge. Bill was in our office on this date and said he would revise the inspection report accordingly.

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Map 722.200a, Ground and Surface Water Monitoring Stations, and Map 728b, Gentry & Castle Valley Ridge Mine Inflows have been revised to show the new wells and spring to be monitored. Eight copies of the revised maps and table are enclosed for insertion into PAP sets.

If you have additional questions do not hesitate to contact me.

Respectfully,



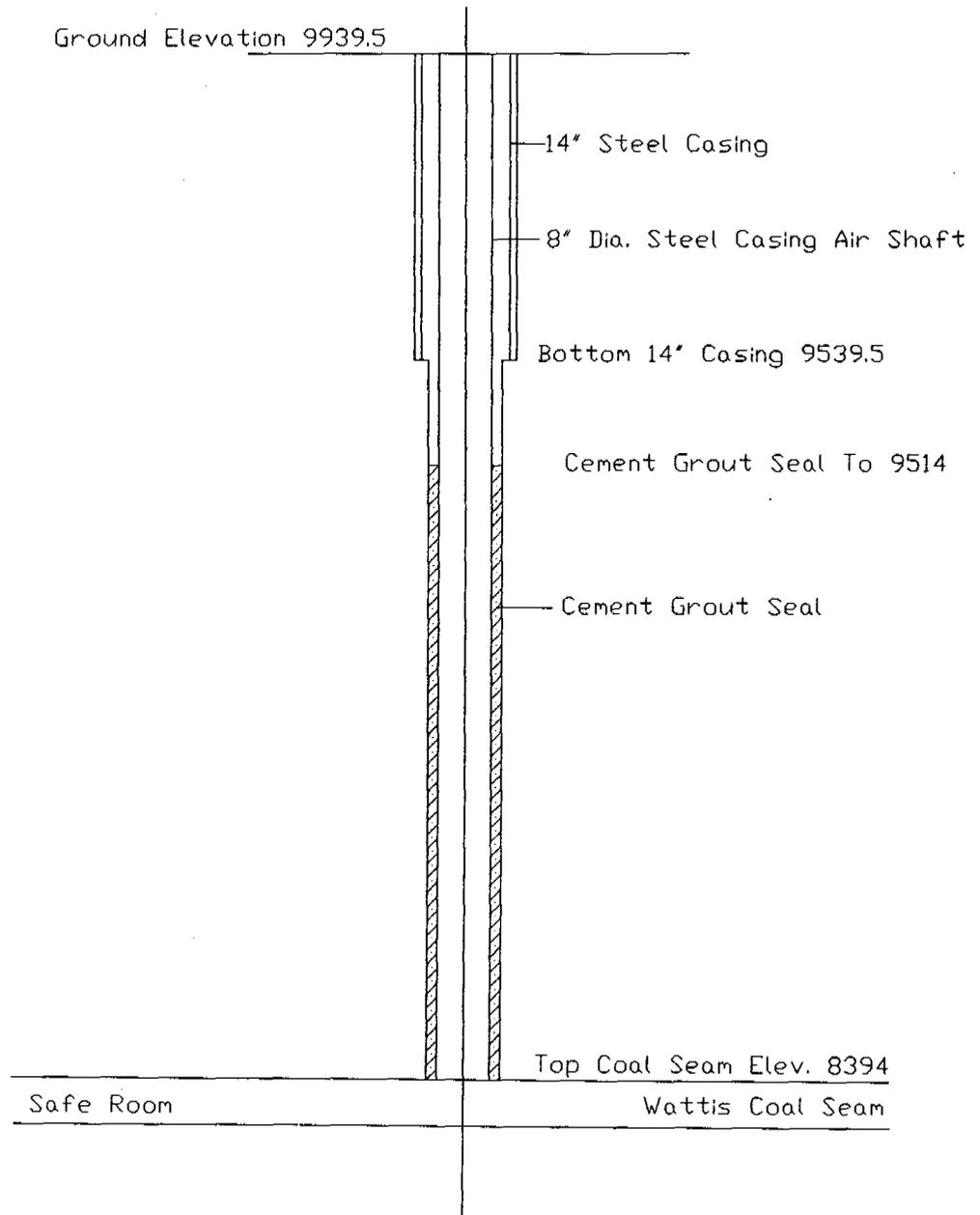
Ben Grimes  
Environmental Coordinator

Enclosures

File: ENV 4-1-12, ENV 2-5-2-1-1-2, ENV 2-5-2-1-1-1,  
ENV 2-5-2-16-5-10

Chrono: BG911204

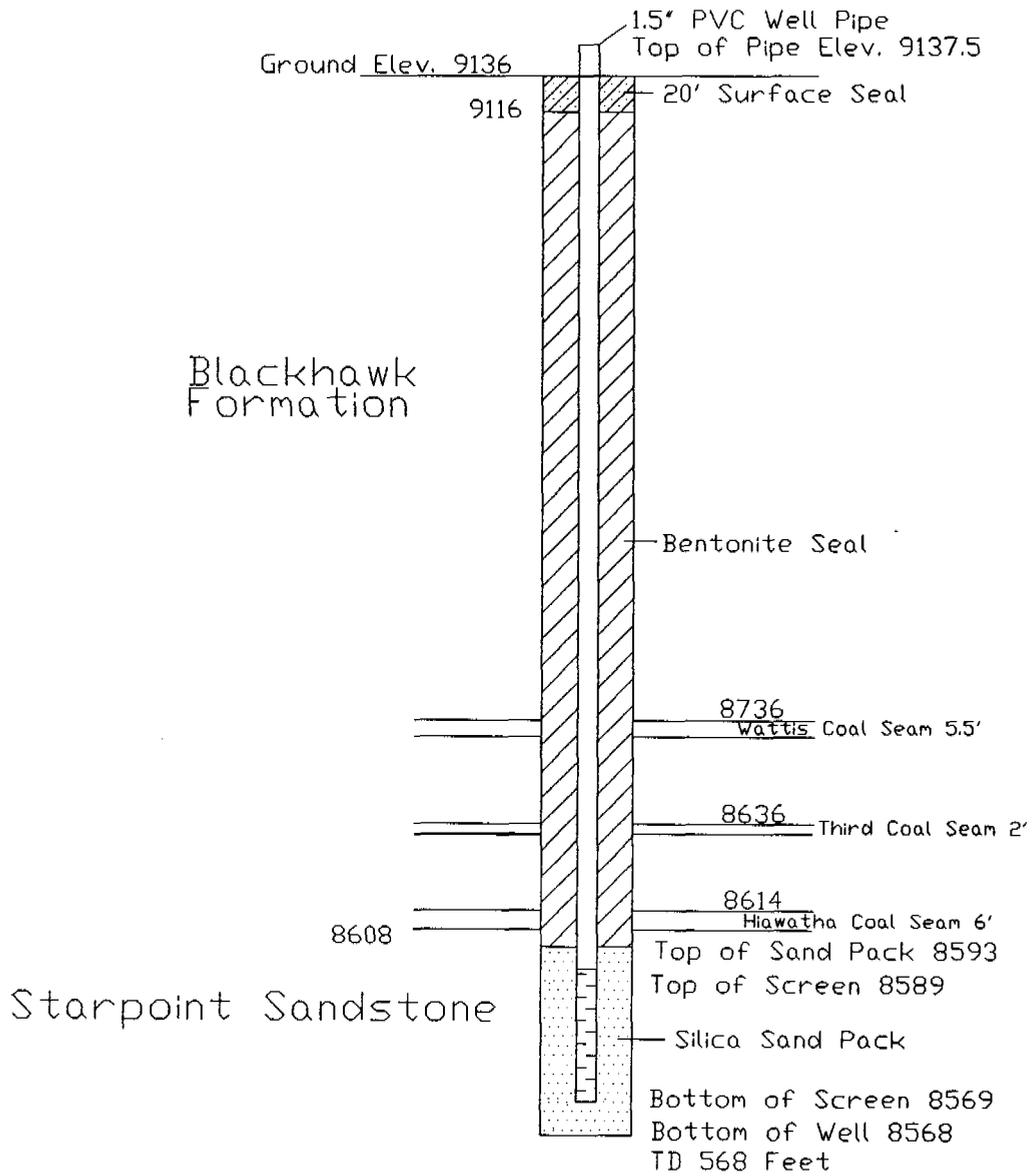
# Gentry Mountain Air Shaft



Coordinates: N 431,596.7  
E 2,111,988.3

Not To Scale

# Monitor Well 92-10-1



Coordinates: N 437,720.7  
E 2,108,194.6

Not To Scale