

0038

*Per/Ken W - please draft
a response
Tom*

Cyprus Plateau Mining Corporation
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July 6, 1993

ACT/007/006 #2
RECEIVED

Mr. Lowell Braxton
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Salt Lake City, Utah 84180-1203

JUL 08 1993

DIVISION OF
OIL, GAS & MINING

*Copy Tom
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Dear Mr. Braxton,

Re: Water Monitoring Parameter Changes

We received your letter dated June 29, 1993 outlining changes to the water monitoring requirements. This letter is to ask for consideration of a variance from the filtering requirement.

Your letter seems to indicate that only baseline metals analyses require filtration. This, in our opinion, may lead to confusion when trying to make comparisons of baseline and ongoing data.

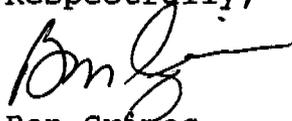
We believe the requirement to field filter metals samples will lead to confusion with Cyprus Plateau data, and that it will add an undue burden on us. Since we have always taken samples unfiltered, it may lead to errors in comparisons of data. To change at this time, some 13 years after monitoring started will lead to confusion. Our laboratory filters the samples when they receive them, and since the samples are acidified, results are considered accurate.

Our monitoring program is extensive, we currently monitor quality at 29 springs, 12 stream locations, 4 in-mine sites and 3 ground water wells. To require field filtration would be very difficult and time consuming. Because of the time requirement and the accessibility of many of our monitoring sites, we regularly use a helicopter to complete most of surface work. Even with a helicopter it takes about 2.5 days to do the field work. If we had to field filter, the time requirement would increase greatly, and increase our expenses significantly (currently about \$3,000/month, \$4,500/month with filtering). Many of the springs require long hikes, even with the helicopter, to carry a filter and pump would be very difficult. Even if samples were collected and filtered at the helicopter as soon as possible, this requirement would be difficult and expensive. If we do the monitoring without a helicopter, carrying a filter and pump would be extremely difficult.

I will be submitting a permit amendment in the near future to adjust our monitoring program to the other changes mentioned in your letter.

Thank you for consideration of this request for variance.

Respectfully,



Ben Grimes
Environmental Coordinator

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