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Mine file
L.P. B
J. Whitehead



United States Department of the Interior
OFFICE OF SURFACE MINING
Reclamation and Enforcement
BROOKS TOWERS
1020 15TH STREET
DENVER, COLORADO 80202

JUL 24 1985

Mr. Lowell P. Braxton, Administrator
Mineral Resource Development and Reclamation Program
Natural Resources
Division of Oil, Gas and Mining
355 West North Temple, Suite 350
Salt Lake City, Utah 84180-1203

RECEIVED

JUL 26 1985

DIVISION OF OIL
GAS & MINING

AG 1/007/007
#2

Dear Mr. Braxton:

The Office of Surface Mining (OSM) has reviewed the Cumulative Hydrologic Impact Assessment (CHIA) for the Kaiser Coal Corporation's Sunnyside mines, dated June 10, 1985, and has found the level of study to be appropriate to determine a range of probable effects on water quantity and quality. However, the cumulative impact area appears small, and the amount of salt added to the river system due to mining is not shown.

The cumulative impact area (CIA) appears small and the CHIA does not explain your logical process for restricting the size of the CIA. The CHIA must explain why the mining areas to the north and west (including Sunedco's leases in T13S, R12E) and the mining areas to the south (the Geneva mine and Kaiser South leases in T16, R15E), that drain to tributaries to the Price River, are not included in the CIA. These areas would cover mining areas for which development information is available.

The CHIA indicates mine discharge water is marginal to sub-marginal for fisheries (trout), livestock water and irrigating alfalfa. A comparison of the probable water quality with and without mining should be included. The comparison should use selected stations in the mine's surface water monitoring program and some downstream station, such as the Price River station at Green River, Utah. Cumulative impacts are best shown as acre-feet of water past a point, tons of salt past the same point, and concentrations (parts per million or mg/l) at low, high and mean flows. The additional tons of salt past a point is very helpful in determining the probable magnitude of the impact on the Price River and Colorado River system especially with respect to the Colorado River Basin Salinity Control Forum's requirements. CHIA's for mines in the Colorado River Basin should include estimates of salt added to the river system by mining the CIA.

The concentration of applicable water quality constituents with and without mining needs to be compared with the Utah water quality standards and the criteria for each of the known uses of the water. Details of

standards and water quality use criteria, plans for mitigation, measures to control pollutants and a complete monitoring plan are needed for complete evaluation of this CHIA. Please provide these materials as soon as available.

During the term of this permit, water quantity does not appear to be adversely affected. A new CHIA will be required before the next permit is issued. The mitigation of the 26-year postmining reduction of irrigation water needs to be addressed. Possible mitigation measures might include transfer of water rights, use of the shafts as wells or flooding the mine after closure with surface water during periods of surplus flows.

If you have any questions, please contact Dwight W. Kimsey at (303) 844-2451 or Richard Holbrook at (303) 844-3806.

Sincerely,

A handwritten signature in black ink that reads "Allen D. Klein". The signature is written in a cursive style with a large, stylized "A" and "K".

Allen D. Klein
Administrator
Western Technical Center