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WAYNE,

I sent a copy of OSM's comments to Bob Eccli, if he has any questions he is to call you or OSM.

TJS

Route to Tom & Wayne
File in
ACT/007/011
File JWS
TJS

United States Department of the Interior

OFFICE OF SURFACE MINING
Reclamation and Enforcement
BROOKS TOWERS
1020 15TH STREET
DENVER, COLORADO 80202

OFFICE OF THE REGIONAL DIRECTOR

18 JUL 1980

RECEIVED
JUL 25 1980
DIVISION OF
OIL, GAS & MINING

Mr. James Smith, Jr.
Coordinator of Mined Land Development
Utah Department of Natural Resources
Division of Oil, Gas, and Mining
1588 West North Temple
Salt Lake City, UT 84116

Dear Mr. Smith:

We have reviewed the Water Monitoring Plan for U.S. Fuel Company's King Mines. The plans were submitted in correspondence from Mr. Suchoski of your Office, dated January 4, 1980. After reviewing this document, we have the following comments and recommendations.

Within the Gentry Mountain area, there are many springs in addition to those on U.S. Fuel Company's map. Many of these springs are critical to the maintenance of the existing population of livestock and wildlife. The Office of Surface Mining (OSM), the Division of Oil, Gas, and Mining (DOGM), the Forest Service (FS), and the Company need to meet to identify critical springs for monitoring. Those springs that contribute to streams flowing through disturbed areas should be monitored monthly. Final locations and procedures for sampling must be approved by the regulatory agencies.

Basic geologic data, including a map, should be part of this monitoring program. The Bear Canyon Fault is apparently a major ground water channel. The effects of mining on flow rates needs to be addressed. A ground water inventory should be included in the plan. Exploratory drill holes and an old gas well that is still cased could possibly be used to develop a water level map. The plan states that water diverted into the underground storage reservoir will be monitored, but the location and procedure has not been identified.

U.S. Fuel Company's program calls for samples of intermittent streams to be analyzed biannually. Samples should be analyzed on a monthly basis, when water is present, so that water quality data is representative of runoff, high and low flows, rainfall events and baseflow.

Perennial streams in areas of disturbance should be monitored monthly during baseline collection and after mining begins. If effluent limitations are being exceeded, a higher frequency is required.

In addition, we are concerned about how the data will be displayed. Appropriate data displays, such as maps, charts, tables, overlays, and narrative descriptions are essential to the success of the program. Data collected and filed are of no value and often cannot be later evaluated unless properly recorded and documented. We would like to commit the operator to at least annual summaries to the regulatory authority. U.S. Fuel Company must make a commitment to maintain the sampling sites and to have qualified persons taking samples.

This Office cannot approve U.S. Fuel Company's Water Monitoring Plan until the concerns outlined above can be met.

If you have any questions, please contact John Nadolski or Marianne Adams at (303) 837-3773.

Sincerely,

Don Crane

DONALD A. CRANE

cc: Trippe, USGS, Denver
Moffitt, USGS, Salt Lake City
Christensen, Manti-LaSal National Forest
Johnson, Forest Service
Eccli, U.S. Fuel Company