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UNITED STATES FUEL COMPANY

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March 24, 1988

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DIVISION OF
OIL, GAS & MINING

Ms. Susan Linner, Permit Supervisor
Division of Oil, Gas and Mining
3 Triad Center, Suite 250
Salt Lake City, Utah 84180-1203

Dear Ms. Linner;

U.S. Fuel Company has been monitoring streams and springs in and around the permit area for ten years. During this period of time, sampling has been conducted on a monthly basis for streams of both an intermittent and perennial nature. Last year, when the permanent mine permit was approved, samples were taken according to the dates specified in the permit which is monthly for the months of April through October. We feel this schedule is still excessive based on the fact that the monitoring program has been ongoing since 1978 and the average sample history for a typical site is 53. This is, as an example, like sampling one site every month for almost four and a half years. (In reality the samples have been taken over a period of ten years.)

The "Guidelines For Establishment of Surface and Ground Water Monitoring Programs" drafted by DOGM (revised July 1985 edition) suggest that a permittee take monthly flow samples and quarterly water quality measurements on perennial streams and monthly flow measurements and water quality samples on intermittent streams for both baseline and operational standards. U.S. Fuel feels, based on their long history of extensive monitoring, that quarterly quality monitoring of both perennial and intermittent streams would be sufficient. Flow measurements would be taken on a monthly basis. We would like to begin this revised monitoring schedule as soon as possible. Please call me if you care to discuss any points of our request.

Sincerely,

Jean Semborski

Jean Semborski
Environmental Coordinator

JS:lj

