Ogmcoal Dnr< ogmcoal@utah.gov>

Re: Lila Water Monitoring Data

1 message

Amanda Daniels< amandadaniels@utah.gov> Wed, Jun 26, 2013 at 9:11 AM
To: "Marshall, Jay" <jmarshall@coalsource.com>
Cc: Ogmcoal Dnr <ogmcoal@utah.gov>

Jay-
From what I am looking at in the MRP, I was under the impression that this spring was to be monitored quarterly after baseline was complete. I've attached highlighted pages from the MRP of what I'm looking at. Is there something else you going off of that I haven't seen?

On Tue, Jun 25, 2013 at 6:05 PM, Marshall, Jay <jmarshall@coalsource.com> wrote:

> Amanda:
>
> The two years of baseline is complete.
>
> Jay
>
> **From:** Dp dqgd#Gdqlhov#^p dlwr=dp dqgdgdqlhovC xwdk1jry'#
> **Sent:** Wxhvgd|/#Mxqh#58/#5346#7=57#SP
> **To:** P duwkdo/#Md|
> **Subject:** Old#Z dwhu#P rqlwruhj#Gdwd
>
> Jay-
>
> I just noticed that I'm missing data for Quaker Spring, 3C, for the 4th quarter of 2012. Was a sample take at that site during the 4th quarter?
>
> --
> Amanda Daniels
> Utah Division of Oil, Gas and Mining
> (801) 538-5262
> amandadaniels@utah.gov

--
Amanda Daniels
Utah Division of Oil, Gas and Mining

(801) 538-5262
amandadaniels@utah.gov

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been monitored as L-9-G was determined using GPS coordinates. The location for this site was determined to be different than what was plotted on the Plates 7-1, 7-1A, and 7-3. Based on this new data, the location of the spring has been updated.)

L-10-G is also an unnamed spring that matches Earthfax sample site 14. Since this site is located over 1 mile south of the permit area, it has been replaced with L-12-G which is a more appropriate site to monitor. Monitoring of site L-10-G was suspended as of the First Quarter of 2003.

L-11-G is located in the bottom of the upper reaches of Lila Canyon. This is in the same drainage as the Mont and Leslie Springs water right locations. In recent years L-6-G (H-18) has been dry. However, there has been some minimum flow observed approximately one hundred yards above L-6-G where L-11-G was established.

L-12-G is an unnamed spring which had been developed but is now abandoned.

L-13-S, L-14-S, L-15-S, and L-18-S are sites being monitored to assist in characterization of the various drainages.

L-16-G and L-17-G are seeps being monitored in Stinky Spring Canyon. These sites were not identified during baseline surveys and are believed to exist intermittently and are not always evident. These two seeps appear to be an important source of water for Bighorn sheep specifically in the early spring.

L-20-G is a seep located north of the permit boundary along a tributary to Little Park Wash. It was identified in the original spring and seep survey and will now be monitored.

It should be noted that data has been gathered on the various seeps/springs as part of the original baseline inventory for the South Lease by I.P.A. The data was gathered over the years 1993, 1994 and 1995 and was stopped. In the second quarter of 2001 water monitoring continued.

731.214.2 until "Monitoring is no longer necessary to achieve the purposes set forth in the monitoring plan approved under R645-301-731.211."

Therefore, UEI requests that the ground water monitoring plan be modified as follows:

One spring to the north of the northern edge of the permit boundary named Quaker Spring, will be monitored for two years to develop a baseline data set. It will be designated as L-20-G. Following the baseline data collection its monitoring will follow the operational monitoring schedule for the upper springs.

As baseline for the ground water conditions has been described by the monitoring to date for the Lila Canyon permit area, UEI would like to discontinue monitoring of the monitoring well water levels until mining intercepts the projected regional piezometric surface, as shown on Plate 7-1, and the springs and seeps until just before second mining takes place within the mine permit area. If mining encounters the regional piezometric surface, then water level monitoring will be resumed. Two years before second mining is anticipated to start, then monitoring of the wells and springs and seeps will resume and the data compared with the baseline.

UEI recognizes the Division's concerns for springs, L-G-16 and L-G-17, located at the top of the Mancos Shale, below the escarpment. While concerns of the use of these springs for wildlife have been suggested, UEI does not believe that the wildlife are using these waters. The TDS values have been excessive which are believed to limit or preclude the use of this water by wildlife. At the Division's request, these sampling sites will continue to be monitored, while additional evaluation of wildlife use is made.

The existing baseline data shows the current ground water conditions for the permit area. No significant groundwater impacts have been identified from current first mining activities. Continuous additional monitoring will only unnecessarily duplicate costs for data that has already been collected.

Table 7-3
Lila Canyon Mine
Water Monitoring Stations

Station	Location	Type	Frequency	Remarks
L-20-G	Quaker Spring	Seep	Sampling Commenced 1Qtr 2011	North of Permit Boundary
IPA-1	Little Park	Borehole	**Sampling Temporarily Suspended 3Qtr 2011**	Water Level Only
IPA-2	Little Park	Borehole	**Sampling Temporarily Suspended 3Qtr 2011**	Water Level Only
IPA-3	Little Park	Borehole	**Sampling Temporarily Suspended 3Qtr 2011**	Water Level Only

NOTE: Sites CG-2, CG-3, CG-4, CG-5, CG-6, and CG-7 were suspended following completion of wash characterization study. Other sites temporarily suspended until two year prior to second mining.