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Technical Analysis and Findings

Utah Coal Regulatory Program

April 13, 2015

PID: C0070013
TaskID: 4816
Mine Name: HORSE CANYON MINE
Title: WATER MONITORING FREQUENCY CHANGES

Operation Plan

Hydrologic Ground Water Monitoring

Analysis:

On March 13, 2015, the Division received an application to amend the MRP for the Lila Canyon Mine. These revisions are to Table 7-3 to change the status of some water monitoring points from temporarily suspended to actively monitored on a quarterly basis, or temporarily suspended to permanently suspended.

The following spring monitoring sites were changed from temporarily suspended to actively monitored (each quarter): L-7-G, L-8-G, L-9-G, L-11-G, L-12-G.

The monitoring status of spring L-20-G (quaker spring) was changed to permanently suspended.

Sites that were changed from temporarily suspended to active, were changed so that baseline data on these springs could be re-established two years prior to any influence due to second mining. This was a requirement outlined in the MRP.

No reason was given as to why spring L-20-G was changed to permanently suspended. For this lack of justification, the amendment does not meet the requirements of R645-301-731.214.

Deficiencies Details:

R645-301-731.214 The Permittee needs to provide a thorough explanation and justification for permanently suspending monitoring requirements of spring monitoring location L-20-G. This justification should include information as to why the site is no longer needed in the monitoring plan, its proximity to historic and future mining, and information that demonstrates that the site has not been impacted by mining operations.

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Hydro Surface Water Monitoring

Analysis:

On March 13, 2015, the Division received an application to amend the MRP for the Lila Canyon Mine. These revisions are to Table 7-3 to change the status of some water monitoring points from temporarily suspended to actively monitored on a quarterly basis, or temporarily suspended to permanently suspended.

Surface water monitoring location L-19-S was changed from temporarily suspended to actively monitored (each quarter). Surface water monitoring locations L-13-S and L-14-S were changed from temporarily suspended, to permanently

suspended.

Sites that were changed from temporarily suspended to active, were changed so that baseline data on these locations could be re-established two years prior to any influence due to second mining. This was a requirement outlined in the MRP.

No reason was given as to why sites L-13-S and L-14-S were changed to permanently suspended. For this lack of justification, the amendment does not meet the requirements of R645-301-731.224.

Deficiencies Details:

R645-301-731.224 The Permittee needs to provide a thorough explanation and justification for permanently suspending monitoring requirements of monitoring locations L-13-S and L-14-S. This justification should include information as to why the site is no longer needed in the monitoring plan, its proximity to historic and future mining, and information that demonstrates that the site has not been impacted by mining operations.

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