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October 7, 1997

TO: File

THRU: Daron Haddock, Permit Supervisor *DAR*

FROM: James D. Smith, Reclamation Specialist *JDS*

RE: Change to TA - Alkali Tract Significant Revision, Canyon Fuel Company, LLC, Soldier Canyon Mine, ACT/007/018-96-1, File 2, Carbon County, Utah

SUMMARY

UDOGM prepared a Technical Analysis, dated June 12, 1997, for the Alkali Tract Significant Revision to the Soldier Canyon Mine MRP. As part of a discussion on September 18 involving Dave Spillman and Dan Ferriter of Canyon Fuel Company, Keith Zobell of Mayo & Associates, and Pete Hess, Joe Helfrich, Mike Suflita, Daron Haddock, and myself of UDOGM it was determined that the TA was in error because it stated that surface-water monitoring station G-1 was no longer to be monitored. Because of a deficiency identified in an earlier TA, the Alkali Tract Significant Revision had been changed in a final submittal so as to indicate that monitoring of G-1 would continue for two years concurrent with monitoring of a new station, G-6. This change in the monitoring plan was overlooked in the final TA. The following revised section of the TA indicates that monitoring of station G-1 is to continue through 1998.

TECHNICAL ANALYSIS

ENVIRONMENTAL RESOURCE INFORMATION

HYDROLOGIC RESOURCE INFORMATION

Regulatory Reference: 30 CFR Sec. 701.5, 784.14; R645-100-200, -301-720.

Surface-water monitoring plan.

The surface-water monitoring plan is based upon the PHC determination and the analysis of all baseline hydrologic, geologic, and other information in the Alkali Tract Significant Revision and current Soldier Canyon Mine MRP.

Monitoring locations proposed by the Alkali Tract Significant Revision are listed in Table 7.24-1 and shown on Exhibit 7.21-1. Sites G-1, G-2, and G-5 have been monitored in the past and G-6, G-7, G-8, and G-9 are new sites. Soldier Creek will be monitored concurrently at both G-1 and G-6 for 2 years, and monitoring at G-1 will cease after 1998. G-6 will then replace G-1 as the permanent monitoring station upstream of the Soldier Canyon Mine. G-1 is to be discontinued because it is too far upstream of the mine to provide a good a comparison in evaluating effects of mine water discharges into Soldier Creek. Information from site G-6, which is situated closer to the disturbed area than G-1, should more accurately indicate the condition of surface water entering the disturbed area.

Sites G-3 and G-4 (Exhibit 7.21-5) were monitored up to 1986 and 1985 respectively. G-3 and G-4 will not be monitored under the Alkali Tract Significant Revision. However, in comparing Exhibits 7.21-1 and 7.21-5 of the Alkali Tract Significant Revision it appears that the new site G-7 is at approximately the same location on Soldier Creek as G-4, and Table 7.24-1 gives the same elevation and approximate location for these two sites. Comparison of Exhibits 7.21-1 and 7.21-5 also indicates that the old site G-3 and the new site G-9 are at approximately the same location on Pine Creek, but the location descriptions and elevations for G-3 and G-9 in Table 7.24-1 indicate G-3 probably was closer to the confluence with Soldier Creek than G-9. Along with G-7 and G-9, site G-8 is intended to permit evaluation of impacts from coal mining on Pine Creek and the relationship between the Blackhawk Formation and creek flow. G-7, G-8, and G-9 are intended to be temporary (p. 7-166), although Table 7.31-1

indicates they are permanent.

Monitoring of G-2 will cease one year following the end of active mining in the vicinity of this site. Monitoring of Soldier Creek at G-5, just downstream of the permit boundary, will continue. Site G-10 has been added to monitor surface flow from the Alkali Tract.

Findings:

Information in the Alkali Tract Significant Revision is considered adequate to meet the minimum requirements for the baseline surface-water monitoring plan.