



State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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March 17, 2000

Chris Hansen, Environmental Manager
Canyon Fuel Company, LLC
HC 35 Box 380
Helper, Utah 84526

Re: Water Monitoring Point 2-11-W, Canyon Fuel Company, LLC, Gordon Creek No. 2/7/8/
Mines, ACT/007/016-AM00A, Outgoing File

Dear Mr. Hansen:

The Division has found your amendment submittal of March 9, 2000 to be deficient. A review of the requested changes found some errors that are outlined in the enclosed technical analysis. As a result your plans cannot be approved.

Please review them carefully and prepare a response which will address the findings of deficiency. We will expect your revised plans by April 30, 2000. Thank you for your help in completing these requirements.

Please call me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Daron R. Haddock".

Daron R. Haddock,
Permit Supervisor

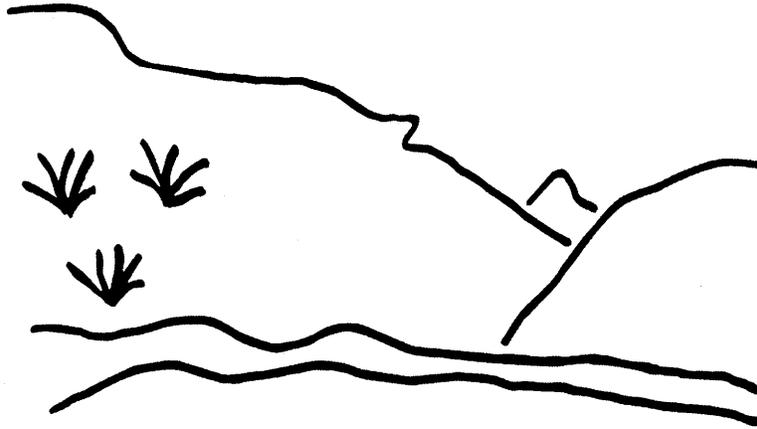
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Enclosure

cc: Price Field Office

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State of Utah



Utah Oil Gas and Mining

Coal Regulatory Program

Gordon Creek 2, 7, & 8
Water Monitoring Point 2-11-W
ACT/007/016-AM00A
Technical Analysis
March 15, 2000

INTRODUCTION

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An amendment was received at the Division on March 9, 2000. The applicant submitted change to the water monitoring plan. Susan White, the current DOGM inspector for the mine, had talked to Chris Hansen about some of the changes made to the water monitoring plan at reclamation which have resulted in some confusion about monitoring site locations. Chris submitted this amendment to address those issues. A review of the submittal found some deficiencies that still require some changes to the water monitoring plan and cannot be approved at this time.

RECLAMATION PLAN

RECLAMATION PLAN**HYDROLOGIC INFORMATION**

Regulatory Reference: R645-301-742, -301-761.

Analysis

The operator supplied an update of water quality monitoring schedules in the amended text, Page 7-56. Comparing the new submittal to the existing operations monitoring sites reveals that Site 2-11-W was removed from the plan and Monitoring site 2-9-W was moved to a new location. When Pond #2 was reclaimed and the new sedimentation pond constructed, the applicant continued using the site with designation 2-1-W, UPDES discharge location at the new sedimentation pond discharge point.

The amendment also showed changes to monitoring site 2-10-W. It was previously located below the disturbed area. The amendment changes the location to the inlet of the sedimentation pond.

The applicant describes the surface water monitoring plan in Chapter 7, Page 7-26 and outlines the monitoring schedule in Table 7-17. Plate 7-2 identifies the monitoring locations. The applicant needs to provide a discussion in the text about the change of site 2-1-W and the disturbed areas which drain into the pond before and after reclamation, (including the date the site was transferred to the new pond.

The applicant shows the monitoring Site 2-9-W will be moved from a location below the minesite to a location where disturbed area runoff enters the sedimentation pond. This monitoring site is now designated 2-11-W. This change could cause confusion in tracking data and is not recommended for approval.

Findings:

The information submitted by the applicant remains incomplete at this time. The applicant needs make the mine's Water Monitoring Plan concise (Tables 7-17) by reevaluating the monitoring plan and identifying sites that will not overlap data.

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