



## State of Utah

DEPARTMENT OF NATURAL RESOURCES  
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March 6, 1992

Mr. Rick Olsen, President  
Soldier Creek Coal Company  
P.O. Box I  
Price, Utah 84501

Dear Mr. Olsen:

Re: March 5th Meeting, Permit Stipulations for Five-Year Permit Renewal, Soldier Creek Coal Company, Soldier Canyon Mine, ACT/007/018, Folder #5, Carbon County, Utah

In the meeting with Johnny Pappus, Tom Paluso, and Dave Spillman of Soldier Creek Coal Company (SC3), Jim Smith and myself of DOGM, a change in the in-mine monitoring plan was discussed. Because SC3 is reducing coal production, the representatives suggested decreasing in-mine water monitoring. Therefore, part one of the permit stipulation R645-301-731.200 would be affected.

In order to achieve the change in the monitoring program, the Operator will be required to submit an amendment to the plan. In order to receive the approval of the Division the Operator shall demonstrate that the proposed plan meets the requirements of R645-301-731 and any other applicable requirements. The Operator should show that the proposal meets the requirements of the regulations based on the PHC determination.

A method for presenting the PHC and linking it to the monitoring proposal was briefly discussed. As a suggestion I proposed the Operator present the available data to show trends in in-mine water flow, and state reasons as to why monitoring is, or is not necessary. A new less intensive monitoring method that achieves the objective of the present monitoring scheme could be used. In reading the memo by Dave Darby, to DOGM File on October 17, 1986, it appeared the objective of the in-mine monitoring was to account for the mine water budget.

My suggestion for amending the monitoring plan and linking it with the PHC included:

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1. Show what the pattern of measured flows, and water quality is over time as par of the PHC.
2. Establish a relationship with low measured flows high measured flows, evaporation, storage and measured discharge for the in-mine water budget.
3. Base the proposed monitoring on the findings of the PHC, larger flows should continue to be monitored. Be sure to consider sensitive areas such as proposed mining under streams.

Be aware that the present monitoring scheme must be followed until the proposed amendment is approved by the Division. Please note, that according to the operators representatives, it was agreed by Dave Darby and SC3, that "significant flows would be measured" and that significant flows were considered to be 5 gal/min.

Other discussions in the meeting included, consideration of increased baseline information for any new lease areas. Continue to improve the PHC, to relate it to the plan, and to meet the relative permit stipulations. The Operator also indicates new information would be used to update their piezometric map. I suggest the operator prioritize updating the piezometric map.

Feel free to call me, or other DOGM staff, if you need assistance. I have included a copy of OSM's PHC guidelines for your information.

Sincerely,



Sharon Falvey  
Reclamation Specialist

Enclosure  
MEETSC3.MEM  
cc: B Team