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STATE OF UTAH
NATURAL RESOURCES
Oil, Gas & Mining

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July 16, 1985

Mr. Allen Klein, Administrator
Office of Surface Mining
Brooks Towers
1020 15th Street
Denver, Colorado 80202

Dear Mr. Klein:

RE: CHIA, Emergency Lease, Tower Resources, Inc., Centennial Project, ACT/007/019A, Folder No. 2, 3, and 4, Carbon County, Utah

Enclosed is the Cumulative Hydrologic Impact Assessment (CHIA) for Tower Resources' Emergency Lease Proposal. This document should be inserted into the Draft Findings and Supporting Documentation (FSD) package for the Emergency Lease sent to you on June 28, 1985.

The CHIA finds that damage to the hydrologic balance outside the mine plan area will be prevented. Please feel free to contact Lowell Braxton or Susan Linner if you have questions.

Best regards,

Dianne

Dianne R. Nielson
Director

SCL:jvb
cc: Allen Emmel
Mark Humphrey
Lowell Braxton
Dave Cline
Dave Darby
Joe Helfrich
Susan Linner
Rick Summers
0028R-34

CUMULATIVE HYROLOGIC IMPACT ASSESSMENT
Tower Resources, Inc.
Centennial Project
ACT/007/019
Carbon County, Utah

July 15, 1985

I. Introduction

The purpose of this report is to provide a Cumulative Hydrologic Impact Assessment (CHIA) for Tower Resources, Inc., Centennial Project located in Carbon County, Utah. The assessment encompasses the probable cumulative impacts of all anticipated coal mining in the general area on the hydrologic balance and whether the operations proposed under the application have been designed to prevent damage to the hydrologic balance outside the proposed mine plan area. This report complies with federal legislation passed under the Surface Mining Control and Reclamation Act (SMCRA) and subsequent Utah and federal regulatory programs under UMC 786.19(c) and 30 CFR 784.14(f), respectively.

Tower Resources Inc. Centennial Project is located within the Book Cliffs Coal Field approximately 10 miles north-northeast of Price, Utah (Figure 1). The Book Cliffs form a rugged, southerly facing escarpment that delineates the Uintah Basin to the North from the San Rafael Swell to the south. Elevations along the Book Cliffs range from approximately 5,000 to 9,000 feet.

Outcropping rocks of the Book Cliffs range from Upper Cretaceous to Quaternary in age. The rock record reflects an overall regressive sequence from marine (Mancos Shale) through littoral and lagoonal (Blackhawk Formation) to fluvial (Castlegate Sandstone, Price River Formation and North Horn Formation) and lacustrine (Flagstaff Formation) depositional environments. Oscillating depositional environments within the overall reggressive trend are represented by members of the Blackhawk Formation. The major coal bearing unit within the Book Cliffs Coal Field is the Blackhawk Formation.

Precipitation varies from 20 inches at higher elevations to 5 inches at lower elevations. The Book Cliffs area may be classified as mid latitude steppe to desert.

Vegetation varies from the sagebrush/grass community type at lower elevations to the Douglas fir/aspen community at higher elevations. Other vegetative communities include mountain brush, pinyon-juniper, pinyon-juniper/sagebrush and riparian. These communities are primarily used for wildlife habitat and livestock grazing.

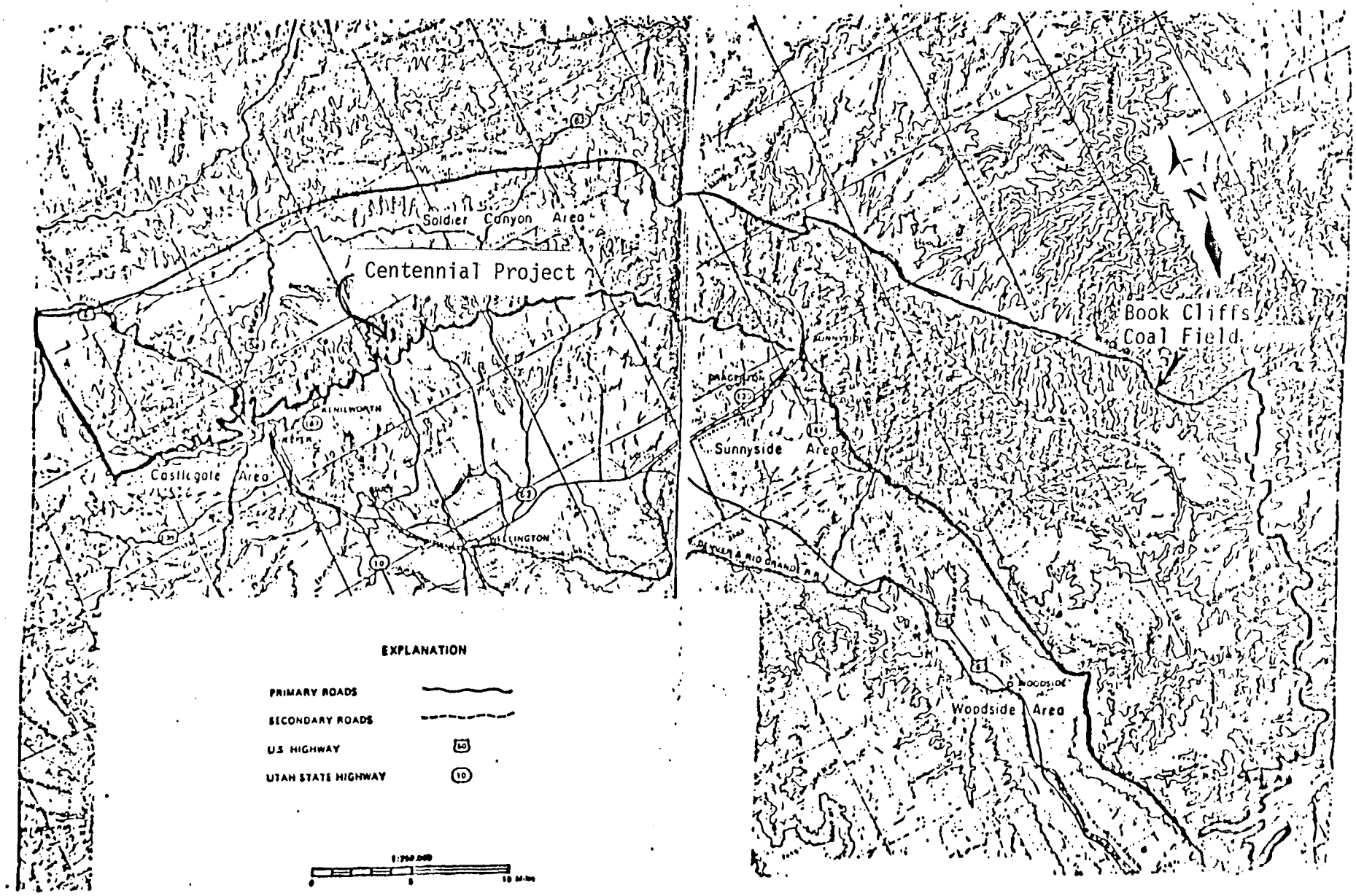

Figure 1. Book Cliffs Coal Field.

From:. Doelling 1972.

Surface runoff from the Book Cliffs area flows into the Price River drainage basin of east-central Utah. The Price River originates near Scofield Reservoir and flows southeasterly into the Green River, north of the town of Green River, Utah. Water quality is good in the mountainous headwater tributaries, but deteriorates rapidly as flow traverses the Mancos Shale. The shale lithology typically has low permeability, is easily eroded and contains large quantities of soluble salts that are a major contributor to poor water quality. Depending upon the duration of contact, water quality degrades downstream to where total dissolved solids (TDS) levels of 3,000 milligrams per liter (mg/l) are common. The predominant ion leached from the Mancos Shale is sulfate (SO_4) with values over 1,000 mg/l common in the lower reaches of the Price River.

II. Cumulative Impact Area (CIA)

Figure 2 delineates the CIA for current Centennial Project operations. The CIA includes the Deadman Canyon drainage, the Straight Canyon drainage, the Hoffman Creek drainage and several other unnamed ephemeral drainages between Deadman Canyon and Hoffman Creek. The eastern boundary is designated by the Coal Creek drainage and the southern boundary is defined by the southern extent of Sections 27, 28, 29 and 30 in T13N, R11E. The CIA encompasses approximately 9792.47 acres.

III. Scope of Mining

Initial mining operations of the Centennial Project began in October, 1980 in the Pinnacle Mine on the Zions fee lease. The original Mining and Reclamation Plan was approved in January, 1982, and mining progressed onto the federal leases. In June, 1982 the Apex Mine was opened. In October, 1981 modifications to the federal leases were granted, thus adding 436 acres to the overall mine plan area. The 120 acre federal emergency lease was granted in November of 1983. The coal to be mined from the emergency lease will be extracted as an underground extension of the existing Pinnacle Mine operation. The Centennial Project (including the 120 acre emergency lease) currently comprises approximately 2,798 acres. Mineable reserves within the plan area total approximately 30 million tons.

Three seams of mineable coal are located within the permit area and the approved Mining and Reclamation Plan for the Centennial Project calls for the eventual development of a separate mine in each of these seams. Currently two mines, the Pinnacle (Gilson Seam) and Apex (Lower Sunnyside Seam), have been developed and are currently operating. The third mine in the Aberdeen Seam has yet to be developed.

Production will be from room and pillar mining methods with secondary pillaring. Overburden thickness ranges from approximately 0 to 2400 feet.

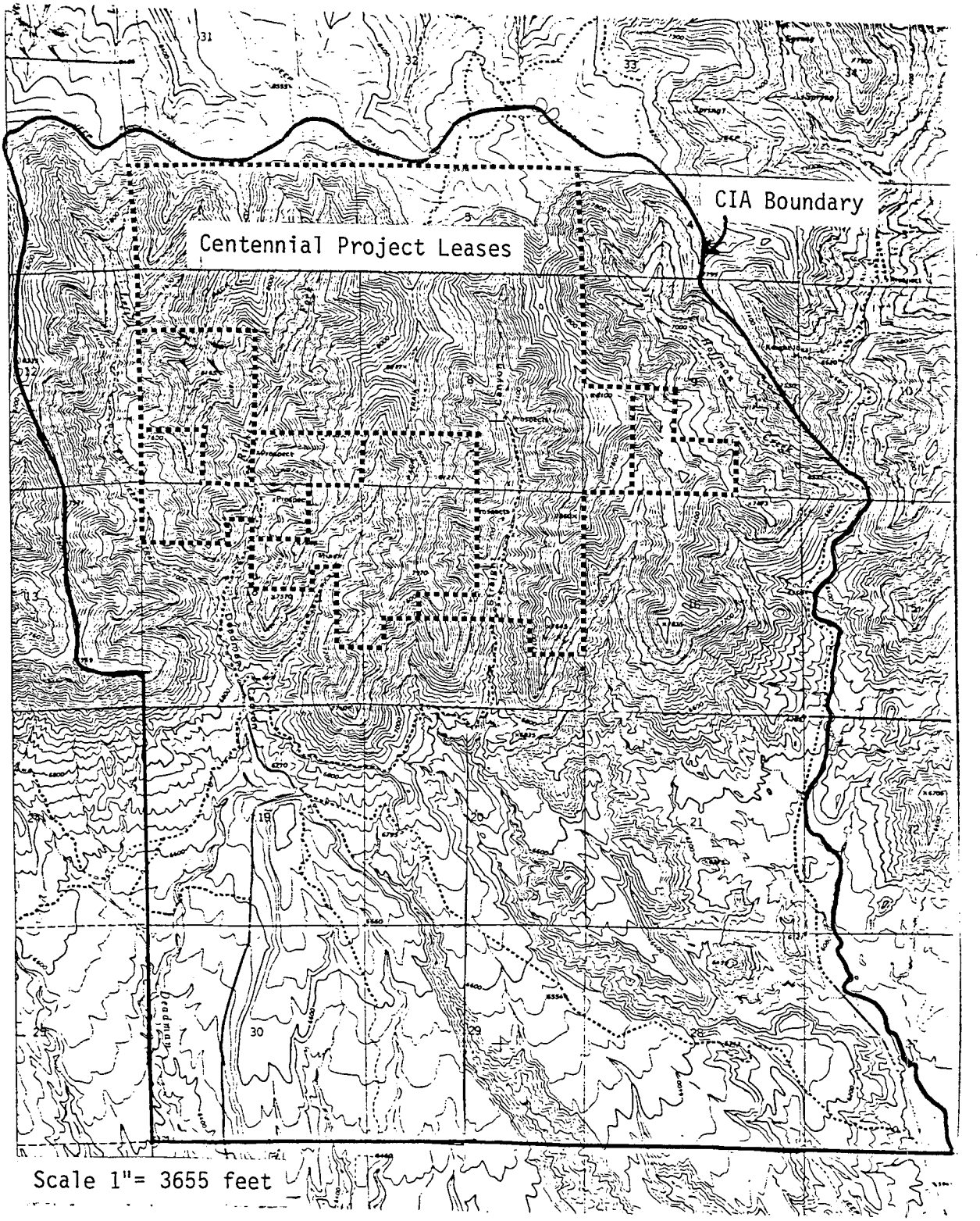

Figure 2. Cumulative Impact Area (CIA)

Tower Resources Inc., has formally submitted an expression of interest for a 328 acre coal tract for consideration as part of the Uintah Southwestern Utah Coal Region, coal lease sale offerings. This tract, known as the Graves tract, is located north and northeast of the Emergency Lease area. Other than this tract and Rights-of-Way granted by the Bureau of Land Management (BLM), Tower Resources Inc., has no interests in lands, options or pending bids for lands which are contiguous to the permit area.

IV. Study Area

A. Geology

The Book Cliffs are basically a homocline (dip slope) dipping into the Uintah Basin with the cliff front roughly paralleling the strike of the feature. The beds are mostly uniform with dips of 3° to 8° to the north and northeast. Occasional faults cut the coal measures in the Book Cliffs but are of small displacement and have been of little consequence in mining. There are no faults known to exist within the Tower Mine plan area. No major faults exist in the area adjacent to the mine plan area, however, Doelling (1972) shows that one minor fault may exist about one-half mile south of the portal area.

Geologic formations exposed within the mine plan area are the Blackhawk and Price River Formation of the Mesa Verde Group and the North Horn and Flagstaff members of the Wasatch Formation (Figure 3). The Blackhawk Formation, which directly overlies the Mancos Shale in the vicinity of the Centennial Project (Doelling, 1972) is the middle and coal bearing unit of the Mesa Verde Group. The Blackhawk consists of a basal sandstone (the Aberdeen Sandstone) overlain by massive beds of gray to buff sandstone with alternating beds of sandy shale, shale and coal (Clark, 1928). In the vicinity of the Centennial Project, the Blackhawk Formation is approximately 1000 feet thick (Doelling, 1972).

Overlying the Blackhawk Formation is the Price River Formation. The Price River Formation is composed of a massive basal sandstone (referred to as the Castlegate Sandstone) and upper beds overlying the Castlegate (Clark, 1928). The Castlegate Sandstone consists of massive, fine-grained to medium-grained sandstone beds (Doelling, 1972) which are gray to buff and composed mainly of semi-rounded quartz grains (Clark, 1928). The Castlegate Sandstone is approximately 250 feet thick near the Tower Mine plan area (Doelling, 1972). The upper portion of the Price River Formation consists of two or more thick beds of sandstone, interbedded with thin-bedded shale and sandy shale (Clark, 1928).

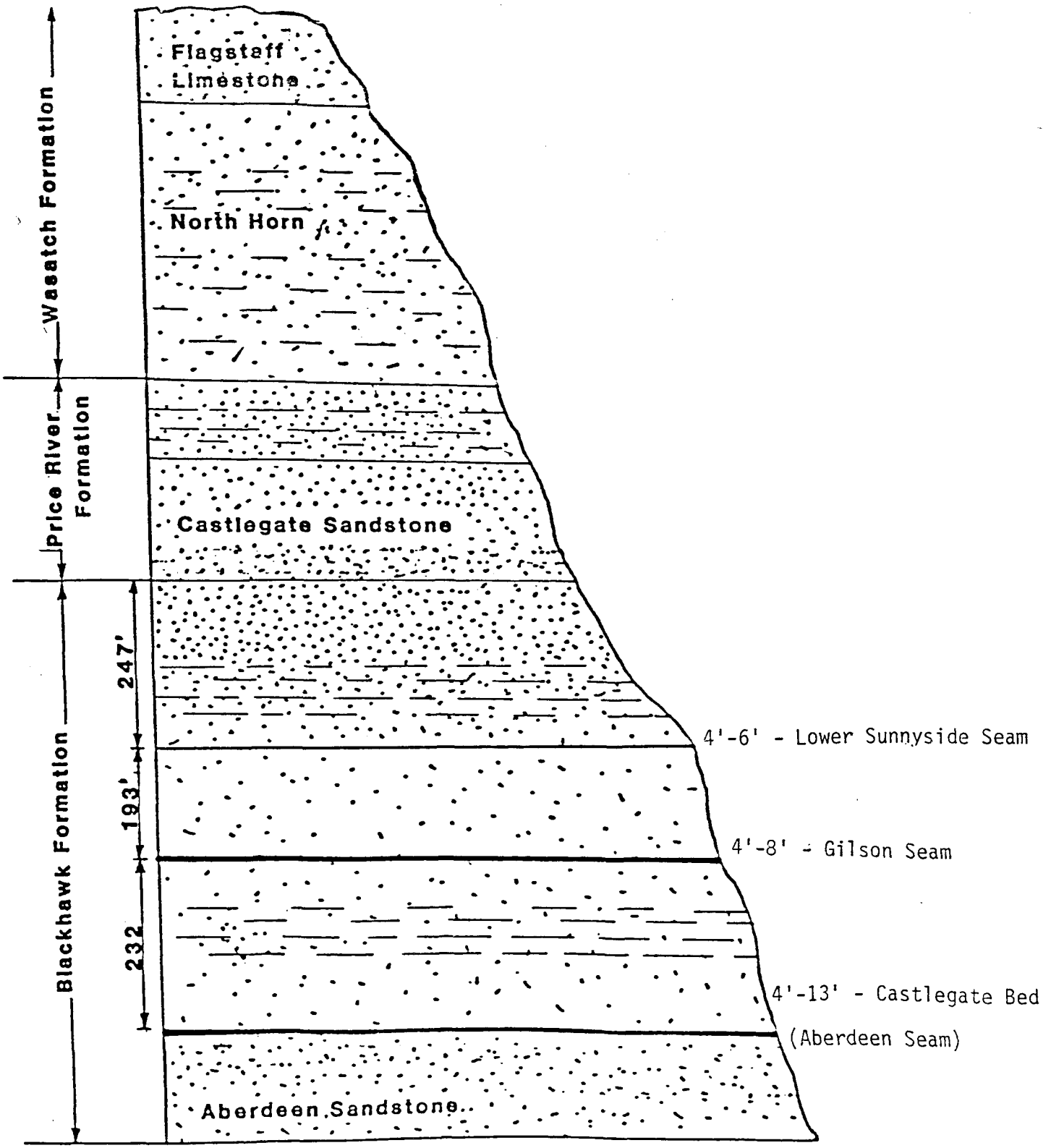

Figure 3. Generalized columnar section of the Tower mine plan area (Doelling, 1972).

The North Horn Formation, the lower most member of the Wasatch Formation, consists of a series of shale, mudstone sandstone, minor conglomerate and freshwater limestone. Near the Tower mine plan area, the North Horn Formation is approximately 600 feet thick.

The Flagstaff Limestone, also a member of the Wasatch Formation, consists of thin-bedded limestones, shales, and sandstones (Doelling, 1972). The Flagstaff Limestone is exposed just north of the mine plan area on the Plateau.

B. Topography and Precipitation

Topography in the area is generally very steep and rugged, with elevations ranging from approximately 6400 feet to 8500 feet above sea level. Slopes vary from vertical cliffs to less than 2 percent. The entire CIA is characterized by a south to south-east ephemeral drainage system that originates above 8400 feet and progressively traverse nonmarine and marine Cretaceous rocks and alluvial fan deposits. The Right and Left Forks of Deadman Canyon and an unnamed ephemeral drainage drain the western portion of the CIA. Straight Canyon, an unnamed ephemeral drainage and Hoffman Creek drain the southeastern portion of the CIA and are tributary to Coal Creek. Coal Creek and Deadman Canyon are both tributary to the Price River.

Precipitation in the Book Cliffs Coal Field ranges from 5 inches to a maximum of 20 inches annually. For the most part along the coal outcrops, 10 to 12 inches of rain are expected (Doelling, 1972).

Mountain-Brush, Desert-Shrub, Pinyon-Juniper Woodland, Sagebrush-Grass, Conifer-Aspen and minor stream side vegetative types cover the total CIA. Most of the area is covered by the Mountain-Brush type while the Pinyon-Juniper Woodland type is predominant in the mine mouth area as well as the access routes and utility corridors.

V. Hydrologic Resources

A. Ground Water

The principle factor controlling the occurrence and availability of groundwater in any area is geology. As noted by Price and Waddell (1972), nearly all of the region in the CIA is underlain by rocks of continental and marine origin, consisting predominantly of interbedded sandstones and shales. Although some of the sandstones in the region

serve as the principle water-bearing strata, their ability to yield water for extended periods of time is largely controlled by the fact that the sandstone beds are relatively impermeable and by the existence of the impermeable interbedded shale layers, which prevent the downward movement of a significant amount of water. According to the U. S. Geological Survey (1979), groundwater in the region exists under water table, artesian and perched conditions. Water table conditions exist primarily in shallow alluvial deposits along larger perennial streams and in relatively flat lying sedimentary rocks. Artesian conditions exist at greater depths where a confining layer overlies a more permeable strata. However, pressures are generally not sufficient to produce flowing wells.

Snowmelt at higher elevations provides most of the groundwater recharge, particularly where permeable lithologies such as fractured or solution limestone are exposed at the surface. Vertical migration of groundwater occurs through permeable rock units and/or along zones of faulting and fracturing. Lateral migration initiates when ground water encounters impermeable rocks and continues until either the land surface is intersected (and spring discharge occurs) or other permeable lithologies or zones are encountered that allow further vertical flow.

The Kenilworth Member, Sunnyside Member and Upper Mudstone Member of the Blackhawk Formation, Castlegate Sandstone, Bluecastle Sandstone Member of the Price River Formation, undifferentiated North Horn/Flagstaff Formation, and Quaternary deposits are potential reservoirs or conduits for groundwater in the CIA. Reservoir lithologies are predominantly sandstone and limestone. Sandstone reservoirs occur as channel and overbank lenticular and tabular deposits, whereas limestone reservoirs have developed through solution processes and fracturing. Shale, siltstone and cemented sandstone beds act as aqualcludes to impede ground-water movement. The Mancos Shale is a regional aquaclude that delimits downward flow within the CIA. Localized aquacludes include the Aberdeen Member and Lower Mudstone Member of the Blackhawk Formation, Lower Unnamed Member of the Price River Formation and relatively thin impermeable lithologies occurring within overlying units.

Well test data from two water wells completed in the Blackhawk Formation near the portal area have been obtained from pumping tests. Well #1 is 130 feet deep and had a static water level of 58 feet below land surface prior to

testing. After four hours of pumping at 50 gallons per minute, the water level had been lowered to 67 feet below land surface. In January 1981, after about three months use, this well was almost dry. These facts indicate that the aquifer may yield up to 5.5 gallons per minute per foot of drawdown but cannot produce a sustained yield over a period of time.

Well #2 was initially drilled to a depth of 155 feet and had a static water level of 57 feet below land surface. After two hours of pumping at 30 gallons per minute, the water level was lowered to 88 feet below land surface. The well was then drilled to a depth of 230 feet and pumped again. After only one hour of pumping at a rate of 30 gallons per minute the water level was lowered from 57 feet to 100 feet below land surface. After three weeks of pumping, in February of 1981, this well also almost dried up. The test results from well #2 indicate that the water bearing zone is less transmissive than well #1 but like well #1, it is very limited in areal extent.

The testing program of wells #1 and #2 was very limited and as a result the data from these tests must be regarded as such. However, estimates of transmissivity and areal extent of the aquifers in which these wells were completed indicate zones of low to moderate transmissivity of limited areal extent. In general these facts substantiate the lenticularity of the Blackhawk Formation and the fact that the water bearing zones are perched with a limited amount of recharge.

Seeps and springs were inventoried within and adjacent to the Tower Mine plan area. Two springs occur within and adjacent to the mine permit area. One spring was identified approximately one-half mile south of the portal area and the other spring is located at the mouth of Hoffman Canyon. Both of these springs occur at or near the contact of the Blackhawk Formation and the Mancos Shale. Average flow is estimated to be less than ten gallons per minute for each spring.

In 1983 Tower Resources encountered groundwater in an area of burned coal during mining operations adjacent to the Emergency Lease. The water exists in the burn area between the underlying and overlying sandstones. The burn area, consisting of burned coal and rubble, acts as a reservoir with limited storage capacity. Recharge is from direct infiltration of precipitation and runoff directly into the outcrop. Due to the permeable nature of the burned outcrop, water easily percolates into the strata, flowing

downgradient until the maximum available storage capacity of the burn area is achieved. Further movement downgradient is prevented by the existence of the relatively impermeable unburned coal. Tower estimates that approximately seven million gallons of water are contained in the burn area.

Very little water has been encountered in the Pinnacle Mine. Water that has been encountered has been in the form of small roof leakers that dry up within a few days or weeks after mining progresses downdrift. Mine inflow is most likely attributed to localized zones of saturation in the Blackhawk Formation.

B. Surface Water

The Tower CIA is situated in the Book Cliffs near the headwaters of the Price River Basin. In general, the chemical quality of water in the headwaters of the Price River Basin is excellent, with this watershed providing most of the domestic water needs of the people below. However, this quality rapidly deteriorates downstream as the streams cross shale formations (particularly the Mancos Shale in and adjacent to Castle Valley) and receive irrigation return flows from lands situated on Mancos-derived soils (Price and Waddell, 1973). Within the Price River Basin, for example, Mundorff (1972) reports that the Price River and its tributaries generally have a dissolved solids concentration of less than 400 milligrams per liter upstream from Helper. The water in this area is of a calcium-bicarbonate type. Between this point and the confluence with Miller Creek, most of the flows originate on or tranverse Mancos shales. Much of the flow is derived from irrigation return flows. The Price River at Wellington, which is near the center of the basin, has an average dissolved solids content of about 1700 milligrams per liter and is of a mixed chemical type (calcium-magnesium-sodium-sulfate). At Woodside, which is about 22 miles upstream from the confluence of the Price River with the Green River, the weighted average dissolved solids content has generally been between 2000 and 4000 milligrams per liter, with the water type being strongly sodium-sulfate.

Sediment yield from the upper portion of the basin is probably negligible (Mundorff, 1972). According to the U. S. Soil Conservation Service (1975), erosion rates in the Price and San Rafael River basins vary from 0.1 to 3.0 acre-feet per square mile per year. The bulk of the sediment yielded each year at the mouth of the Price River comes from limited areas covered with highly erodable shales (Mundorff, 1972).

The Tower mine plan area is drained by ephemeral drainages heading primarily in a southerly direction. The Right and Left Forks of Deadman Canyon and an unnamed ephemeral drainage drain the western portion of the CIA including the area of the surface facilities. Straight Canyon, Hoffman Creek, and an unnamed ephemeral drainage drain the eastern portion of the CIA and are tributary to Coal Creek, a perrenial stream. Coal Creek and Deadman Canyon are both tributary to the Price River.

Surface disturbances related to coal mining occurs only in the Right Fork of Deadman Canyon. Interaction between the surface disturbances and this ephemeral drainage are minimized due to sediment control facilities that are in place. Mining has occured beneath the Right Fork of Deadman Canyon, two unnamed ephemeral drainages, and Straight Canyon. Mining in the Emergency Lease will continue under the Hoffman Creek drainage.

The ephemeral drainages flow in response to snowmelt and rainfall events. Water quality analyses of snowmelt runoff in the ephemeral drainages generally indicate major dissolved chemical constituents of magnesium, sodium, sulfate and bicarbonate.

VI. Potential Hydrologic Impacts

A. Ground Water

Dewatering and subsidence related to mining have the greatest potential for impacting groundwater resources in the CIA.

Dewatering

Very little water has been encountered in the currently operating mine within the Tower mine plan area. Water that has been encountered has been in the form of very small roof leakers that dry up within a few days or week after mining progresses downdrift. No mine water, with the exception of the intercepted burn area water, has been discharged in the past. Water well test data indicate perched aquifers of low transmissivity and limited areal extent. A mining induced dewatering impact is therefore, determined to have a low probability.

Subsidence.

Subsidence impacts are largely related to extension and expansion of the existing fracture system and upward propagation of new fractures. Inasmuch as vertical and lateral migration of water

appears to be partially controlled by fracture conduits, readjustment or realignment in the conduit system will inevitably produce changes in the configuration of groundwater flow.

Potential changes include increased flow rates along fractures that have "opened" and diverting flow along new fractures or permeable lithologies. Subsurface flow diversions may cause the depletion of water in certain localized aquifers, whereas increased flow rates along fractures would reduce groundwater residence time and potentially improve water quality.

B. Surface Water

The main concern in terms of impact to surface water is water quality deterioration downstream from the minesite. The impact to the quantity of water is determined to have no impact due to the ephemeral nature of the drainages. All drainages in the CIA flow only in response to snowmelt runoff and rainfall events. Infiltration rate and runoff volumes will not be affected by the mining operations.

The area influenced by surface disturbance is of limited areal extent and confined only to the Right Fork of Deadman Canyon. Surface sediment controls currently are in place and will continue to be in place during reclamation. The water quality impacts associated with reclamation will be minimal or nonexistent due to the fact all drainage from the disturbed area will be routed through sediment controls and treated prior to any release if a release does occur.

The operational design proposed for the Centennial Project is herein determined to be consistent with preventing damage to the hydrologic balance outside the mine plan area.

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