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STATE OF UTAH
NATURAL RESOURCES
Oil, Gas & Mining

Scott M. Matheson, Governor
Temple A. Reynolds, Executive Director
Dianne R. Nielson, Ph.D., Division Director

4241 State Office Building • Salt Lake City, UT 84114 • 801-533-5771

January 28, 1985

Mr. Allen Emmel
Tower Resources, Inc.
P. O. Box 902
Price, Utah 84501

Dear Mr. Emmel:

RE: Emergency Lease Addendum, ACT/007/019A, Carbon County, Utah

The Office of Surface Mining (OSM) has recently notified the Division of several concerns it has relative to the hydrology portions of the application submitted for the new lease area. After consultation, the Division's hydrologist has agreed with the deficiencies. As outlined below, Tower Resources is requested to provide (1) hydrologic monitoring data collected from October 21, 1980 to the present, (2) an adequate monitoring plan for ground and surface water, and (3) hydrologic information for the entire permit area to bring the current Tower Resources' Centennial permit and the proposed new permit into compliance with Subchapter K and UMC 786.19.

Specific information requirements are as follows:

1. The original Permit Application Package (PAP) and the Emergency Lease Modification request do not provide sufficient ground and surface water information for the operator to determine the probable hydrologic consequences as required by UMC 784.14(c) and 786.19(c). The information should include a description of:

A. Ground Water

Water level or potentiometric surface of the mine plan and adjacent areas.

Quality of subsurface water.

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A. Ground Water (continued)

Description of recharge, storage and discharge areas.

Quantity and quality of any water made in or discharged from the mine.

B. Surface Water

Seasonal variations of surface water flows and quality as per Division guidelines.

2. A detailed map showing the topographic locations of sediment ponds and ground and surface water monitoring sites should be included in the application for the entire permit area as required under UMC 784.14(a).
3. Tower Resources should expand the monitoring program for surface water to include the Right Fork of Deadman Canyon and Straight Canyon within the permit area. For ground water, the area of the new lease expansion should also be covered by the monitoring program (UMC 783.15, 783.16).
4. The application for the permit revision states in Figure 2 (Chapter V) that ground water had been intercepted within the active underground workings adjacent to the proposed expansion area. However, no information was provided as to the inflow rate, duration, or water quality which could be used to determine the significance of the underground water source or the validity of the applicant's conclusions about probable hydrologic consequences (UMC 783.14, 783.15, 784.14[a] [1], 817.50 and 817.52).
5. The original permit application indicates on page 20a (Chapter V) that ground water was intercepted in the burned portions of the Gilson seam. The application for the permit revision has not provided information indicating whether additional saturated burned or unburned coal will be encountered within the expansion area (UMC 783.14, 783.15, 817.50 and 817.52)

It is requested that the Company contact Susan Linner of the Division with a realistic time frame for a response to these deficiencies as soon as possible.

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It has also been brought up by the Office of Surface Mining (OSM) that a mid-term review of Tower's existing permanent program permit is due. The Division would like to postpone it for the time being, in order to facilitate granting this new permit and to work on other Division priorities. However, OSM has not concurred with this proposal as of this time. You should be aware, however, that reworking of the permit application and/or specific information submittals may be required at the time the mid-term review is performed. Please contact me or Susan Linner at 538-5340 if you have questions.

Sincerely,



Ronald W. Daniels
Acting Administrator
Mineral Resource Development
and Reclamation Program

SCL/btb

cc: Allen Klein
Mark Humphrey
Dianne Nielson
Susan Linner
Tom Suchoski

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