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July 17, 1989

TO: Susan Linner, Permit Supervisor

FROM: Rick P. Summers, Reclamation Hydrologist *RS*

RE: Response to Stipulation UMC 817.52 - 1 - RS (Water Monitoring Plan), Received July 10, 1989, Andalex Resources, Inc., Centennial Project, ACT/007/019, Folder #2

SUMMARY:

The above referenced submittal does not fully address the requirements of Stipulation UMC 817.52 - 1 -RS. Additionally, the submittal is intended to replace page 132 of the existing MRP. Replacement of that page will result in removal of pertinent permit information (i.e. post-mining monitoring plans and static water level measurement for well #1). The submittal should be an addition of new material without deletion of existing permit information.

DEFICIENCIES:

The stipulation is included below with items that have not been addressed underlined. The applicant should include these items in the response.

The stipulation is as follows:

Stipulation UMC 817.52-(1) - RPS

1. Within 30 days of permit approval, the applicant must submit an approvable revised surface water monitoring plan. The plan must include a commitment to maintain a rain gauge at the site and keep daily records of precipitation events or nonoccurrence of events. The plan must commit to collection of at least one sample per quarter for a two year period for the surface water monitoring sites with analysis as per the Division's Baseline parameter list. The plan must commit to the same schedule with analysis as per the Division's Operational

parameter list for the remainder of the permit term. The plan may state that a sample will not be collected due to a lack of precipitation events in that quarter as DOCUMENTED by the rain gauge records. The plan must commit to retaining the precipitation records at the minesite to be available for inspection upon request by Division staff.

Clarification of these items is as follows:

1. The plan should commit to daily measurement and recording of events if the standard 8 inch rain gauge is implemented.
2. The plan should commit to obtaining a least one sample per quarter for a two year period unless precipitation records at the site document no precipitation events in that quarter.
3. The parameter list in section 3.1-2 should be divided into two lists. These list should correspond to the baseline and operational lists of the Divisions January 1986 water monitoring guidelines.
4. The plan should commit to retaining the precipitation records at the site to be available for inspection by Division staff.
5. The second paragraph in section 3.1-2 contains an error. The sentence should read "Analysis of all samples will be done (or performed) within allowable holding times as given in the E.P.A. guidelines".

cc: Mike DeWeese  
Dave Darby  
BT6005/153-154