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

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December 17, 1999

TO: File

THRU: Daron Haddock, Permit Supervisor DRH
Pam Grubaugh-Littig, Permit Supervisor

FROM: James D. Smith, Reclamation Specialist JDS

RE: Water Monitoring - Midterm Review and Review of Annual Permits, ANDALEX Resources, Inc., Centennial Mine and Wildcat Loadout, ACT/007/019 and ACT/007/033, File 2, Carbon County, Utah

SUMMARY:

Review of the 1998 Annual Reports for the Centennial Mine and Wildcat Loadout revealed that Utah Division of Oil Gas and Mining is not receiving Discharge Monitoring Reports (DMR) and operational monitoring reports of water-quality and -quantity from these operations on a consistent basis. Much of the missing data was received in November 1999, however, data is still missing, notably the first and second quarters of 1998.

TECHNICAL ANALYSIS:

Operational Monitoring and Annual Reports

A memo dated August 5, 1999 listed missing quarterly operational water-monitoring data and Discharge Monitoring Reports for the Centennial Mine and Wildcat Loadout. Data is missing at least as far back as 1993 (Table 1). A copy of that August 5 memo was attached to the Division's August 19, 1999 letter regarding the midterm review of the Centennial Mine permit. In a phone conversation on July 26, Mike Glasson had already agreed to send copies of the missing data, and much of the missing data was received in November 1999, however, data is still missing, notably for the first and second quarters of 1998 (Table 2). The August memo and letter originated before the end of the third quarter, and reports for the second quarter were not then due: the Division has since received some water-quality reports from the second and third quarters of 1999, but the Division has not yet received analysis results for Well #1, the second quarter of 1999.

Table 1 - Missing Operational Water Quality Data as of August 5, 1999

		Lab Analysis Reports	Field Measurements
Well #1	1998	1st, 2nd, 3rd, and 4th quarters	1st, 2nd, 3rd, and 4th quarters
	1997	1st, 2nd, 3rd, and 4th quarters annual report missing	1st, 2nd, 3rd, and 4th quarters
	1996	1st, 2nd, and 4th quarters	1st, 2nd, and 4th quarters
	1995	3rd (?)* and 4th (?)* quarters	
	1994	3rd (?)* quarter	1st, 2nd, 3rd, and 4th quarters
	1993	1st, 2nd, 3rd, and 4th quarters	1st, 2nd, 3rd, and 4th quarters
12-1 (Alrad Cyn.)	1995-1998	All (?)*	All (?)*
WCW4	1989	3rd quarter	3rd quarter

Table 2 - Missing Operational Water Quality Data as of December 17, 1999

		Lab Analysis Reports	Field Measurements
Well #1	1999	2nd quarter	2nd quarter
	1998	1st and 2nd quarters	1st and 2nd quarters
	1997	1st, 2nd, and 4th quarters Annual report missing	2nd and 4th quarters
	1996	2nd quarter	
	1995		
	1994	3rd (?)* quarter	3rd quarter
	1993		
12-1 (Alrad Cyn.)	1995-1998	All (?)*	All (?)*
WCW4	1989	3rd quarter	3rd quarter

*It is unclear from documents submitted by ANDALEX to UDOGM whether or not field parameters were measured or water samples were analyzed for the quarters marked (?); however, those same documents indicate that the other missing measurements and analyses were done.

UPDES Discharge Monitoring Reports (DMR)

CENTENNIAL MINE

In the August 5, 1999 memo:

UPDES 001, 002, 003, and 004	last DMR dated 30 September 1997;
UPDES 005 and 006	last DMR dated 31 March 1997.

The November submittal to the Division included photocopies of DMRs for October 1997 through April 1998 for all six sites (plus photocopies of older DMRs that were missing but had not been listed). Recently, Mike Glasson has been submitting DMR information to the Division of Water Resources (DWR) by letter because, in spite of repeated requests, DWR has not sent him any DMR forms: copies of letters covering August 1, 1998 through August 31, 1999 (no discharge during this period from any UPDES site) were received with the data in November. Centennial DMR data still missing are:

UPDES 001, 002, 003, and 004	May through September 1998, and after August 1999;
UPDES 005 and 006	April through September 1997, May through September 1998, and after August 1999.

WILDCAT LOADOUT

In the August 5, 1999 memo:

UPDES 001, 002, 003, 004, 005, and 006	last DMR dated 31 March 1997.

Information submitted to the Division in November included photocopies of older DMRs that were missing but had not been listed. The November submittal did not provide any of the missing DMR data listed in the August 5, 1999 memo, except that the letters to DWR covering August 1, 1998 through August 31, 1999 included Wildcat. Wildcat DMR data still missing are:

UPDES 001, 002, 003, 004, 005, and 006	April 1997 through July 1998, and after August 1999.

<u>RECOMMENDATION</u>

The records of Centennial Project should be inspected to determine if the missing water-quality and -quantity data for the first and second quarters of 1998 exist. If the data exist but

have not been submitted, a Notice of Violation should be issued, with abatement being to submit the data to the Division. If the mine has failed to monitor in accordance with the approved mine plan and the data do not exist, a Notice of Violation should be issued for failure to follow the plan and hindrance of inspection.

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APPENDIX

CENTENNIAL MINE

Well #1	1999	- quarterly reports show this well was sampled in the 1st and 2nd quarters: there are no field or lab data for the 2nd quarter. Third quarter lab and field data have been submitted.
	1998	- quarterly reports show this well was sampled in the 1st, 2nd, 3rd, and 4th quarters, but there are no field or lab data for the 1st and 2nd quarters.
	1997	- no annual report, no lab report for 1st quarter, no field or lab reports for 2nd and 4th quarters.
	1996	- quarterly reports show this well was sampled in the 1st, 2nd, and 4th quarters, but there is no lab report for the 2nd quarter.
	1995	- 1st and 2nd quarter samples were collected, but both samples arrived at the lab on 27 July, and the lab reports, which include field data, for both quarters are dated 10 August 1995; - 3rd and 4th quarterly reports indicate samples were collected but there are no lab reports (the lab's Analysis Request, Chain of Custody, and Data Collection forms for these two samples include results of analyses that were done in March and April 1996); - a hand-written note lists field parameters for the 3rd and 4th quarters.
	1994	- lab reports for the 1st and 4th quarters include field parameter values. - results of lab analyses, but not field parameter values, are also listed on the four quarterly reports. • a note on the 2nd quarter report says "sample destroyed" and values for all parameters are listed as zero, • all parameter values are listed as zero for 3rd quarter, with no explanation.
	1993	- lab reports include field parameter values
S18-1	1999	- quarterly reports show no flow in 1st quarter: lab analyses for 2nd and 3rd quarters submitted to the Division.
	1998	- quarterly reports show no flow.
	1997	- no annual report, quarterly reports show no flow.
	1996	- quarterly reports show no flow.
	1995	- quarterly reports show no flow.
	1994	- quarterly reports show either no flow or overflow.
	1993	- quarterly reports show either no flow or overflow.
	1992	- sample collected 2nd quarter, 10 May 1992 (lab report dated 25 June 1992 included field data); - 1st, 3rd, and 4th quarterly reports indicate no samples were collected because of either no flow or overflow due to mine discharge.

S25-1	1999	- 1st and 2nd quarterly reports show negligible flow.
	1998	- quarterly reports show either no access or negligible flow.
	1997	- no annual report, quarterly reports show negligible flow.
	1996	- quarterly reports show either no access or negligible flow.
	1995	- quarterly reports show negligible flow.
	1994	- quarterly reports show either no flow or negligible flow.
	1993	- quarterly reports show either no access or negligible flow.
	1992	- sample collected 2nd quarter, 10 May 1992 (lab report dated 25 June 1992 included field data); - 1st, 3rd, and 4th quarterly reports indicate no samples were collected because of either negligible flow or no access.

WILDCAT

WCW 1, 2 , and 3	last samples collected 27 September 1989 (lab reports dated 10 October 1989).
WCW 4	last sample collected 12 July 1989 (lab report dated 27 August 1989); - the 3rd quarter report indicates there was also a 27 September 1989 sample.

TRANSACTION REPORT

P.01

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UTAH DIVISION OF OIL, GAS AND MINING
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DATE: 20 Dec 1999

FAX #: 435-613-5828

ATTN: Pete HESS

COMPANY: DOGM

DEPARTMENT: PFO

NUMBER OF PAGES: (INCLUDING THIS ONE) 7

FROM: Tim Smith

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FROM: Jim Smith

If you do not receive all of the pages, or if they are illegible, please call (801)538-5340.
We are sending from a sharp facsimile machine. Our telecopier number is (801)359-3940.

MESSAGES:

This is my memo to Daron: note recommendation. Daron is preparing a letter to Mike to close the mid-term review. Wait for Daron's memo then [redacted] a decision can be made on whether or not enforcement action is needed or appropriate

Jim

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