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

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January 14, 2000

TO: Internal File

THRU: Daron Haddock, Permit Supervisor

THRU: 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, ACT/007/019, and Wildcat Loadout, ACT/007/033

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 and more was received in January 2000; however, data are still missing, notably, the first and second quarter of 1998. Information on monitoring of 12-1 in Alrad Canyon is still completely missing. A Notice of Violation should be issued for failure to follow the approved mining plan and hindrance of inspection.

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 are missing at least as far back as 1993. Mike Glasson agreed to send copies of the missing data, and in November 1999 the Division received a thick bundle that contained much, but not all, of the missing data (Table 1).

After a second memo on December 19, 1999, which included a recommendation for a NOV for failure to follow the mining plan, more data were received on January 10, 2000. Data are still missing (Table 2). It is unclear from documents submitted by Andalex to UDOGM whether or not field parameters were measured or water samples collected and analyzed for the

3rd quarter 1994 at Well #1 and the 3rd quarter 1989 at WCW4. In the absence of conclusive evidence that samples were taken and analyzed, UDOGM will assume that the sampling did not occur and the data do not exist.

Table 1 - Missing Operational Water Quality Data as of December 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

Table 2 - Missing Operational Water Quality Data as of January 12, 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	
12-1 (Alrad Cyn.)	1995-1999	All - Information on this site is completely absent from all reports.	All

RECOMMENDATION:

The missing data were not submitted to the Division as part of required quarterly and annual reports and the monitoring plan has not been followed. Andalex has had several opportunities to produce the missing data. Either the monitoring was never done or the Permittee has lost the monitoring results before they could be sent to the Division. A Notice of Violation should be issued for failure to follow the approved mining plan and hindrance of inspection.

sm
cc: Pete Hess, Price Field Office
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APPENDIX - UPDES Discharge Monitoring Reports (DMR)

CENTENNIAL MINE

Centennial DMR data still missing:

UPDES 001, 002, 003, and 004	September 1999.

Mike Glasson has pointed out that there are no UPDES points 005 and 006 at Centennial, contrary to what was stated in previous UDOGM memos. Reports for UPDES 005 and 006 that were in DOGM's Centennial binder have been moved to the Wildcat Loadout binder.

WILDCAT LOADOUT

It is unclear to whether or not the Wildcat Loadout is included in the statement in the September 1, 1999 letter to DWQ that there was no discharge between August 1, 1998 and August 31, 1999. Wildcat Loadout DMR data that are missing:

UPDES 001, 002, 003, 004, 005, and 006	April 1997 through July 1997 (April through June for 002); and September 1999.