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**State of Utah**  
DEPARTMENT OF NATURAL RESOURCES

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**Technical Analysis and Findings**  
**Utah Coal Regulatory Program**

**PID:** C0070022  
**TaskID:** 4445  
**Mine Name:** SAVAGE COAL TERMINAL  
**Title:** ABANDON WELL S-2-GW

**Operation Plan**

**Hydrologic Ground Water Monitoring**

*Analysis:*

The applicant states monitoring well S-2-GW was placed to monitor the wash plant and additional refuse placed at the site. The applicant then states the well no longer necessary because the wash plant has been removed and the entire SCT refuse pile has now been removed and utilized as fuel at the Sunnyside Co-Generation Plant. Further they state ""The results from monitoring those wells for over 20 years showed no impacts to the groundwater regime from the operation"" however no data or analysis is presented to support this statement. These statements do not meet the requirements of R645-301-731.214 because no specific data analysis is presented.

*Deficiencies Details:*

R645-301-731.214 - Monitoring requirements maybe modified by the Division if the operator demonstrates using the monitoring data obtained that monitoring is no longer necessary to achieve the purposes set forth in the monitoring plan. For the Division to release well S-2-GW the data generated must demonstrate that no impacts were observed. To demonstrate this the applicant shall present and analyze the data from S-2-GW with comparison to other wells and/or historic data.

khoffman