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

Michael O. Leavitt  
 Governor  
 Ted Stewart  
 Executive Director  
 James W. Carter  
 Division Director

1594 West North Temple, Suite 1210  
 Box 145801  
 Salt Lake City, Utah 84114-5801  
 (801) 538-5340  
 (801) 359-3940 (Fax)

*ACT 1007/018 #2*

September 3, 1997

To: File  
 Thru: Joe Helfrich, Permit Supervisor-Compliance  
 From: Peter Hess, Reclamation Specialist III *PH*

Post-It* Fax Note	7671	Date	9/4/97	# of pages	2
To	Mike Sullita		From	Pete Hess	
Co./Dept.	SLC-DOG M		Co.	PFO	
Phone #		Phone #			
Fax #		Fax #			

RE: Questions on Monitoring Points, Revised/Approved PHC for Soldier Canyon and Dugout Canyon Mines, ACT/007/018 and PRO/007/039, Folder #2, Carbon County, Utah

Keith Zobell of Mayo and Associates met with me yesterday to discuss some questions that he has regarding some monitoring points that may or may not still be required as part of the water monitoring regime for the Soldier Canyon Mine and the proposed Dugout Canyon Mine. Several of the points mentioned in the MRP are no longer referred to in this revised PHC for the two aforementioned mines. The copy of map 7.21-1 (Surface Water Monitoring Locations for the Soldier Canyon Mine) which is on file at the PFO is stamped as received by the DOGM on 5/31/96; there is no "approved" stamp. I don't know if the sites on this map are approved or not.

A conversation with Mr. Jim Smith on 9/2 indicated that the monitoring point for the waste rock site had been deleted, but it is still shown on the aforementioned map below the four monitoring wells (MW-1M, 2M, 3M and MW-1C) at Anderson Reservoir. These four monitoring wells and their required monitoring parameters are not listed in the revised "approved" PHC; as indicated above, they are shown on map 7.21-1. Are they required to be monitored? The wells listed in the "approved" PHC (6-1, 10-2, 32-1) only require quarterly water level measurements. What wells are required to be monitored for ground water operational parameters, if any?

Monitoring well 5-1 (as mentioned in the SC3 MRP) was mined through or past in 10/95. Has the Division required the permittee to install a new well to replace the information which has been lost from this deletion, or is it felt that this information is no longer beneficial? Is the deletion documented/approved?

Stream monitoring location G-1 is still referred to in the Soldier Canyon MRP; it has been replaced by what is listed as a "new permanent site" known as G-6. Has G-1 and its required monitoring been officially deleted from the Soldier Canyon MRP, as of today? If not,



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an amendment to do so may be required. Stream monitoring location G-6 is located downstream of UPDES mine water discharge points MW-2 and MW-3 (UPDES points #003 and #004).

Springs 3, 15, 18, and 21 are still referred to in the SC3 MRP as requiring monitoring but they are not mentioned in the recently approved PHC submitted by Mayo and Associates. According to Mr. Jim Smith, Barry Barnum wanted to delete the monitoring of these springs. Should the permittee still desire to delete these, they must submit an amendment and receive Division approval in order to do so. Mr. Zobell informed me that he has monitored these springs during the 3rd quarter.

According to Jim Smith on 9/2/97, the surface water monitoring point for the waste rock site has been deleted. What appears to be a "proposed surface water sampling location-currently monitored" still appears on the P.E. certified map 7.21-1 below the four ground water monitoring wells at Anderson Reservoir mentioned above. What the map shows appears to be some sort of surface facility; I'm assuming it is the referred to proposed waste rock site.

It appears that enough questions exist that a meeting should be scheduled to hammer out these issues, plus any more that may arise. I have already discussed this possibility with Jim Smith and Keith Zobell. Messrs. Dave Spillman and Mike Suflita should also be included as they are directly involved.

On 9/3/97, Jim Smith informed me that he was in the process of forwarding information regarding the questions that have arisen. Also, he was investigating some other issues, with regard to this memo.

I will follow this through and keep you informed. I will probably go ahead and try to set up a meeting with all individuals concerned. I definitely believe some documentation will be required if all involved can come to an agreement(s) on the issues. This hopefully will prevent confusion with the monitoring regime in the future.

sd

cc: Keith Zobell, Mayo & Associates  
Dave Spillman, Canyon Fuel Company, Wellington  
Jim Smith, DOGM, SLC