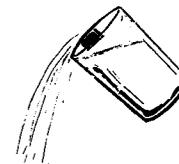


0034

015/004 - mine file

**NORTH EMERY WATER USERS ASSOCIATION**

P.O. BOX 418  
ELMO, UTAH 84521  
TELEPHONE 653-2649



January 18, 1984

**RECEIVED**  
JAN 20 1984

**DIVISION OF  
OIL, GAS & MINING**

Dr. Dianne Nielson  
Attention: James Smith  
Division of Oil, Gas and Mining  
4241 State Office Building,  
Salt Lake City, Ut 84114

Dear Dr. Nielson:

Having been directed by the Board of Directors of the North Emery Water Users Association (NEWUA), I would like to put the Board on record concerning the Beaver Creek Coal Company, Huntington No. 4 Mine, Act 015/004.

NEWUA is a nonprofit Association providing culinary and livestock water to approximately 636 families living in the north portion of Emery County. The sources of water for our system come from springs in Rilda Canyon and Huntington Canyon. The Rilda Canyon Springs consists of three individual springs; two in the bottom of the main canyon and one in a smaller side canyon.

Our concerns lie with one of the springs in the main canyon, the largest producer of the three. In a study prepared for West Appa Coal Company, Vaughn Hansen Associates found that the water in this spring issues from fractures in the north side of the canyon. Based on this finding and others in studies by Vaughn Hansen Associates for other clients, we believe the possibility of contamination or diminution exists from the Huntington No. 4 Mine.

The findings in the West Appa Study alone are enough to warrant further and careful investigation into the matter. The presence of anomalies during the VLF study and the fact that a fracture zone can be seen on aerial photographs with a stereoscope certainly are indicative of fracture patterns.

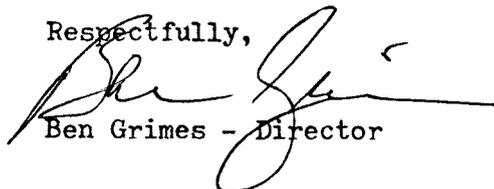
If the fracture zone extends north to the Huntington River as Vaughn Hansen Associates postulates, the Huntington No. 4 Mine will be sitting directly on top of the fracture zone in the Starpoint Sandstone.

January 18, 1984

We recognize Beaver Creek Coal Company's right to mine the coal in Mill Fork Canyon. We do not oppose the development of their mine but, we must be sure that every effort has been expended to insure the integrity of our water supply. We do not feel that an adequate effort has been taken to address the groundwater hydrology in the area as required by UMC 783.13 (a), UMC 783.15 (a), UMC 784.14 (a), UMC 784.14 (b), UMC 784.14 (c), UMC 817.41 (a), UMC 817.41 (b), UMC 817.52 (a) and UMC 817.54 .

In summary, we are concerned with the source of water of our largest producing spring. We are concerned that all parties involved come to a common understanding of the area hydrology; to prove or disprove the theory that the source comes from the north and to satisfy our concerns relative to contamination or diminution.

Respectfully,



Ben Grimes - Director

BG:ll

cc: Marv Allen-Vaughn Hansen Associates  
Huntington-Cleveland Irrigation Co.  
Mark Page- Utah State Engineer - Water Rights - Price  
Joane White- Attny.