



STATE OF UTAH
NATURAL RESOURCES
Oil, Gas & Mining

Norman H. Bangerter, Governor
Dee C. Hansen, Executive Director
Dianne R. Nielson, Ph.D., Division Director

355 W. North Temple • 3 Triad Center • Suite 350 • Salt Lake City, UT 84180-1203 • 801-538-5340

January 29, 1986

CERTIFIED RETURN RECEIPT REQUESTED
(P402 457 295)

Mr. Dan W. Guy, Manager
Permitting and Compliance
Beaver Creek Coal Company
P. O. Box 1378
Price, Utah 84501

Dear Mr. Guy:

RE: MRP Amendment, Request to Amend Water Quality Monitoring
Plan, Huntington #4 Mine, INA/015/004, #3 and #9, Emery
County, Utah

The application for Mining and Reclamation Plan (MRP) permit amendment plans submitted by Beaver Creek Coal Company (BCCC) on December 12, 1985 have been reviewed by the Division. The plans are unacceptable in several areas.

The following list contains BCCC's request for monitoring changes and the Division's review comments for each station.

Station 4-1-W Lower Little Bear Spring

BCCC Request

Discontinue; monitored by Castle Valley Special Service District.

DOGM Response

The MRP requires monthly flow measurements and two water quality samples per year (at high and low flow conditions). Duplicating the efforts of the Special Service District is not necessary, but BCCC remains responsible for the required submittals.

Page 2
Mr. Dan W. Guy, Manager
INA/015/004
January 29, 1986

Station 4-3-W Upper Mill Fork

BCCC Request

Quarterly; three years baseline, data inaccessible four months per year.

DOGM Response

Monthly flow measurements when accessible and quarterly quality (to include one sample each at high and low flow conditions).

Station 4-4-W Mill Fork Above Sediment Pond
Station 4-5-W Mill Fork Below Sediment Pond

BCCC Request

Only when pond discharges; the only possible impact is when pond discharges.

DOGM Response

Monthly flow and quality. The applicability of data gained from these stations is not limited to determining the impact of sediment pond discharges on Mill Fork Creek. Because the stations are located immediately downstream from the area draining the upper portal access road, they are useful in monitoring the influence of recent reclamation activities on water quality from this section. In addition, a history of significant discrepancies exist between Stations 2-4-W and 2-5-W for values of total suspended solids. As a result, the Division views this section as a problem area which warrants continued monitoring.

Station 4-6-W Inflow to Sediment Pond
Station 4-7-W Outflow from Sediment Pond

BCCC Request

Monthly when accessible.

DOGM Response

Monthly flow and quality when accessible.

Page 3
Mr. Dan W. Guy, Manager
INA/015/004
January 29, 1986

Station 4-8-W Lower Mill Fork

BCCC Request

Quarterly, three years baseline data are adequate.

DOGM Response

Monthly flow, quarterly quality (to include one sample each at high and low flow conditions).

Station 4-9-W Upper Little Bear Canyon Spring

BCCC Request

Discontinue, three years baseline data are adequate

DOGM Request

Flow and quality to be measured twice per year at high and low flow conditions.

Station 4-10-W Mill Fork Pump

BCCC Request

Discontinue; pump removed.

DOGM Response

Discontinue.

During the Division's review of past data from the above sites, several problems were observed which need to be addressed as part of your resubmittal:

1. Plate 7-3 from the MRP entitled "Water Quality Monitoring Locations" is not complete. Please provide an updated copy which locates each station by its respective code.
2. Please ensure that the above-mentioned codes and locations are consistent with those listed in the monthly water quality reporting forms.

Page 4

Mr. Dan W. Guy, Manager

INA/015/004

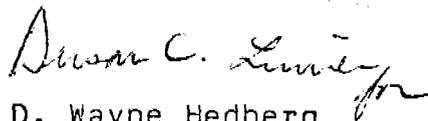
January 29, 1986

3. Ensure that the monthly reports for each station include all of the parameters listed on page 7-91a of the MRP. In the past, total manganese, carbonates, bicarbonates, calcium, sodium and potassium have been omitted.

As you are aware, the Division has recently adopted an updated set of Surface and Ground Water Monitoring Guidelines. These current guidelines identify three phases of hydrologic monitoring; baseline (most intensive), operational, and postmining (least intensive). Please be advised that BCCC will be eligible to enter the postmining monitoring phase two years from the date when all surface reclamation activities on the site were completed.

Thank you for your cooperation in this matter. Please provide a response to the remaining concerns by February 17, 1986. Should you have any questions or concerns, please contact me or David Wham of the technical staff.

Sincerely,



D. Wayne Hedberg
Permit Supervisor/
Reclamation Hydrologist

DMW/btb

cc: Allen Klein
Lowell Braxton
Dave Lof
Tom Munson
John Whitehead

0505R-14-17