



United States Department of the Interior
 OFFICE OF SURFACE MINING
 Reclamation and Enforcement
 BROOKS TOWERS
 1020 15TH STREET
 DENVER, COLORADO 80202

orig - mine plan file
 cc J. Smith

~~To Sir~~
 File Act 10/15/015
 Folder #2
 JIM

SEP 18 1984
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David Schouweiler
 Consolidation Coal Company
 Mid Continent Region
 12755 Olive Boulevard
 St. Louis, Missouri 63141

RECEIVED

SEP 10 1984

DIVISION OF OIL
 GAS & MINING

Dear Mr. Schouweiler:

We have reviewed the life of mine drawdown maps for the Upper Ferron aquifer which were delivered to the Office of Surface Mining (OSM) by Mr. Louis Meschede of Consol. Although Mr. Meschede included the Drawdown Contour maps received from the Conoco office where the CONOSIM model was generated, none of the actual drawdown data produced by the model has been included to document the results shown on the contour maps.

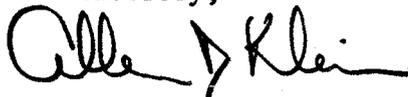
A notable inconsistency in the drawdown maps is the steep gradient of the potentiometric contours, as opposed to the shallow parabolic shape that would be expected in a confined aquifer. This question makes it essential that supporting raw drawdown data generated by the CONOSIM model be provided to OSM to assist in our review of the results. In addition, a detailed analysis of the potential damage to the quality of the Ferron aquifer as a result of dewatering and associated leakage from the saline Bluegate Shale should be discussed. The statements in section 7.1.5.2, on page 7-91 of the permit application describe the hydraulic connection between the Bluegate Shale and upper Ferron Sandstone as "imperfectly understood." The text further states that "piezometer nests installed . . . during the fall of 1979 are designed" . . . to contribute to resolution of this "imperfectly understood" subject. Results of those piezometer tests installed in 1979 may be particularly helpful now.

Another major concern with regard to the Emery Deep permit application package is that there may be significant impacts on the hydrologic regime which would not be mitigated by plans in the permit application as submitted. If this is the case, the issues would have to be evaluated through the preparation of an environmental impact statement (EIS) to meet the requirements of the National Environmental Protection Act (NEPA). The drawdown of the upper Ferron aquifer during mining is critical to the long term impact on the hydrologic regime. This could also be important to the finding of no material damage to the hydrologic regime.

OSM suggests that your staff contact those persons at Conoco responsible for the CONOSIM model of the Emery Deep mine, and arrange to meet with OSM staff within two weeks of receipt of this letter. The Utah Division of Oil, Gas, and Mining will be contacted regarding their option to attend as well. At that time the drawdown model questions can be discussed and subsequently a decision regarding the necessity of an EIS can be made.

To arrange a meeting, or if you have any questions, please call Louis Hamm or Walter Swain at (303) 844-3806.

Sincerely,

A handwritten signature in cursive script that reads "Allen D. Klein". The signature is written in black ink and is positioned above the typed name.

Allen D. Klein
Administrator
Western Technical Center

cc: Robert Hagen, OSM - Albuquerque Field Office
Dianne Nielson, DOGM ✓
Susan Linner, DOGM