

RECEIVED**MAR 30 1984****DIVISION OF
OIL, GAS & MINING**Bio/West, Inc.
P.O. Box 3226
Logan, UT 84321

March 30, 1984

Mr. Lynn Kunzler
Reclamation Biologist
Utah Division of Oil, Gas, and Mining
4241 State Office Building
Salt Lake City, Utah 84114

Dear Mr. Kunzler:

Over the course of working on the Emery Mine Plan review, several issues have arisen which has made the review much more time consuming and involved. These issues have dealt with the following:

subsidence impacts to the Upper Ferron aquifer and resulting dewatering of the aquifer

impacts to wells and springs in the aquifer

increase in the salt loading in the aquifer

subsidence effects to the surface

bonding for subsidence and other operations that the operator did not provide bonding estimates for.

Dealing with these issues has been further complicated by the time constraints that have been placed on the reviewers (both the contractor and DOGM) and the applicant. In particular, the deficiencies in the hydrology section of the permit application were extensive, and to obtain the information in the least amount of time, required that the reviewers work with the applicant on the preparation of the responses and obtain information in advance over the telephone such that work on the Technical Analysis (TA) could continue. Coordination between the contractor and DOGM was very time consuming while attempting to resolve issues, develop approaches for the preparation of the TA, and relay information needs to the applicant. As evidenced by this effort, this TA is essentially stipulation free and most sections are essentially complete at this time pending review by OSM and further discussion of the significant issues surrounding the permitting of this operation.

The contractor has also worked with OSM in dealing with the hydrology and subsidence issues. Trips to OSM have been made, and telephone conversations have led to revisions in the Technical Analysis and questions sent to the operator. This has been beneficial in that some OSM concerns have been addressed up-front before they became issues during the final review process.

With the above justification, the contractor is proposing the following costs associated with the additional effort that has been put into this review over the last several months.

TELEPHONE

	Mountain Bell	Sprint
Nov.	-	\$48.20
Dec.	\$26.90	\$159.25
Jan.	\$73.84 (conference call to Conoco)	\$124.55
Feb.	-	\$11.96

Total phone bill: \$444.70 (copies of all phone bills can be supplied)

The phone bill would not have been as high if the review could have been conducted in a more "normal" mode with less stringent timeframes and discussion of issues.

HYDROLOGY

It is estimated that an additional 20 hours were spent in the review of the hydrology due to working with Consol (Conoco in Ponca City did the ground water modeling so discussions were held with them also), defining with OSM the "current" approach to preparation of a CHIA, and determining how to resolve issues surrounding ground water impacts at Emery.

A meeting was held with OSM and Consol. First issues and approaches were discussed with OSM and then with OSM and Consol. This meeting lasted 4 hours and was attended by a ground water hydrologist, surface water hydrologist and mining engineer (for input on subsidence). This was an additional 12 hours of effort.

MANAGEMENT

Coordination of the TA was very time consuming due to time spent determining when information was to come in, arranging and attending meetings on the different issues, handling of several different submittals and incorporating the additional information into the TA, and discussion of issues with DOGM and OSM.

Due to the original concerns on the TA format, discussions were held between OSM, DOGM and the contractor to define the suitability of the TA.

An additional 40 hours was spent in the management area working on this project.

COMPUTER COMMUNICATIONS

Due to the fact that DOGM made revisions on the contractors draft TA on their wordprocessor, changes could not be readily made on the document at the contractors word processor. As such, instead of retyping the document or searching through the DOGM hard copy for the changes, it was decided to transmit the document first on a disc, and the over the phone lines when that failed. As a result, time was spent on the "learning curve" trying to get the word processors to communicate and then once the document was received, converting it so that it would be compatible with the contractors word processing software. As a result, an additional 30 hours was spent by technical staff on the contractors side to produce the final document.

SUMMARY

The total additional time spent on the contract is as follows

Telephone		= \$444.70
Groundwater Hydrologist	24 hours x \$18/hour	= \$432
Surface Water Hydologist	4 hours x \$14/hour	= \$ 56
Mining Engineering	4 hours x \$14/hour	= \$ 56
Management (Bio/West)	20 hours x \$16.36/hr	= \$327.20
(Richardson Assoc.)	20 hours x \$14/hour	= \$280
Computer (Bio/West)	18 hours x \$16.36/hr	= \$294.48
(Richardson Assoc.)	12 hours x \$14/hour	= \$168
Overhead (0.25 on B/W labor)		= \$155.42
	TOTAL	\$2213.80

Your consideration of this matter is greatly appreciated. Please feel free to contact me if you have any questions or need any additional information.

Sincerely,

A handwritten signature in cursive script that reads "John A. Rice". The signature is written in dark ink and is positioned above the printed name.

John A. Rice