



GARY R. HERBERT
Governor

GREGORY S. BELL
Lieutenant Governor

State of Utah

DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER
Executive Director

Division of Oil, Gas and Mining

JOHN R. BAZA
Division Director

Outgoing
C0150015
#3898
R

November 14, 2011

John A. Gefferth, Environmental Engineer
Consolidation Coal Company
P.O. Box 566
Sesser, Illinois 62884

Subject: Revision of Groundwater Monitoring Plan, Consolidation Coal Company, Emery Deep Mine, C/015/0015, Task ID #3898

Dear Mr. Gefferth:

The Division of Oil, Gas and Mining (the Division) has reviewed your Revision to the Groundwater Monitoring Plan for the Emery Deep Mine. Deficiencies have been identified that must be addressed prior to receiving final approval. The deficiencies are listed as an attachment to this letter.

Each deficiency identifies its author's initials in parentheses in order to facilitate communication between your staff and the Division's if necessary. The plans as submitted are denied. Please resubmit the application by January 15, 2012.

If you have any questions, please feel free to contact Daron Haddock (801) 538-5325 or myself (801) 538-5350.

Sincerely,

Steve Christensen
Permit Supervisor

SKC/sqs
O:\015015.EME\WG3898\WG3898Def_Ltr.doc



Deficiency List

Task No. #3898

Evaluation/Revision of Groundwater Monitoring Plan

The members of the review team include the following individuals:

Steve Christensen (SC)

R645-301-728: The Permittee must revise the Probable Hydrologic Consequences Determination (PHC) of the approved MRP to address potential hydrocarbon contamination of ground and surface water resources within the permit and adjacent area of the Emery Deep Mine. Oil has been reported in monitoring wells AA-M, AA-U, H-L, H-M, H-U, I-B, I-L, I-M, R2-U and Lewis-U. (SC)

R645-301-731.210: The Permittee must provide additional groundwater monitoring data. Oil has been reported in monitoring wells AA-M, AA-U, H-L, H-M, H-U, I-B, I-L, I-M, R2-U and Lewis-U. Additional sampling of these wells must be conducted in order to determine the nature, chemical composition and extent of potential hydrocarbon contamination. (SC)

R645-301-301-748 and -765: The Permittee must revise Section VI.4.8, *Casing and Sealing of Wells* (See page VI-39) and Section VI.6.5, *Permanent Casing and Sealing of Wells* (See page VI-41). The revision must outline the techniques/methods that will be utilized when permanently sealing monitoring wells that are no longer required. The monitoring well sealing methods must be compliant with R655-4-14 (State of Utah rule outlining the abandonment of wells). (SC)