



State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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August 30, 1988

Mr. David R. Smaldone, Director
Permitting, Compliance and Services
Utah Power and Light Company
Mining Division
41 North Redwood Road
Salt Lake City, Utah 84140

Dear Mr. Smaldone:

Re: Remaining Deficiencies for Mid-Term Review, Utah Power and Light Company, Deer Creek Mine, ACT/015/018, Folder #2, Emery County, Utah

Attached are the Division comments on the July 13, 1988 Utah Power and Light Company (UP&L) submittal regarding the mid-term review currently being conducted by the Division on the Deer Creek Mine Permit Application Package (PAP). The attached comments identify the remaining issues which must be addressed by UP&L in order to successfully conclude this review.

After reviewing the comments, please submit a complete response addressing each comment no later than September 30, 1988.

Please feel free to contact me or members of my staff if you have questions on any of these matters.

Sincerely,

John J. Whitehead
Permit Supervisor/
Reclamation Hydrologist

djh
Attachments
cc: P. Rutledge, OSM
Tech Review Team
WP+/19

MID-TERM REVIEW
DEER CREEK MINE
ACT/015/018

Utah Power and Light Company
Emery County, Utah
August 1988

UMC 782.13 Identification of Interests - (PGL)

The statement "Coal mining will not take place within the areas of this permit" on page 1-2 is erroneous and must be corrected.

UMC 784.13 Reclamation Plan: General Requirements - (PGL/BAS)

(b)(2) Costs for Item 1-H "Water Storage Tank" (100,000 gallon water storage tank) needs to be revised. In a letter to the Division from Utah Power and Light Company dated July 31, 1986, the estimated reclamation cost for this item was \$11,288, rather than the amount shown for \$1,279. Please revise.

At permit renewal, the Division recommends that interim and final reclamation seed mixes be revised. The rate of seed application is too high for some species and too low for others. Seed costs and availability may dictate some changes, as well. Introduced species should be replaced with native species.

UMC 817.43 Diversions - (TM)

The approved Deer Creek PAP was reviewed and approved by the Office of Surface Mining in 1985. Unfortunately, no disturbed area design calculations were included in the permit. Please submit for inclusion into the PAP, complete design calculations for all disturbed drainage structures such as ditches, culverts, erosion prevention measures (inlets, outlets, etc.) and alternative sediment control structures.

UMC 817.52 Hydrologic Monitoring - (RVS/TM)

The mine inflow monitoring program at the Deer Creek Mine is currently not adequate to identify and characterize major inflow sources. Future permit renewals will require the development of Probable Hydrologic Consequence (PHC) statements and attendant Cumulative Hydrologic Impact Assessments (CHIAs). Both PHCs and CHIAs must necessarily discuss potential impacts resulting from the interception of ground water by mine workings. Inflow data derived during the current permit terms are especially applicable to projecting inflow rates and water quality impacts during future permit terms. Accordingly, the mine inflow monitoring program must be modified to encompass major inflow sources to acquire a useful data suite for future permit renewals.

The mine inflow monitoring program must also be flexible so that it accommodates both areas of new development and inaccessibility in areas that have been completely developed. Inflow surveys should be conducted periodically and the inflow monitoring program should be changed, through the formal amendment process, as necessary.

Please submit for inclusion into the PAP a complete and adequate underground mine inflow monitoring program.

The operator must take the information submitted in conjunction with their response to UMC 784.14 and incorporate this information into one monitoring plan which clearly spells out the monitoring stations for the Deer Creek Mine versus other UP&L mines. Since spring monitoring is not an issue which can be differentiated from one mine to the other because of overlapping coal seams, this information can be kept as one clear, concise program. The information stated in the April 30, 1987 letter must be incorporated into the overall monitoring plan.

djh
WP+/19-21