



OGMCOAL DNR &lt;ogmcoal@utah.gov&gt;

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**Fwd: Deer Creek Mine portal**

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Keenan Storrar <kstorrar@utah.gov>  
To: OGMCOAL DNR <ogmcoal@utah.gov>

Wed, May 20, 2015 at 2:12 PM

Keenan Storrar  
Utah Division of Oil, Gas and Mining  
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----- Forwarded message -----

From: **Edward Hickey** <[ehickey@utah.gov](mailto:ehickey@utah.gov)>  
Date: Wed, May 20, 2015 at 10:54 AM  
Subject: Re: Deer Creek Mine portal  
To: Keenan Storrar <[kstorrar@utah.gov](mailto:kstorrar@utah.gov)>  
Cc: Daniel Hall <[dhall@utah.gov](mailto:dhall@utah.gov)>

Keenan,  
I spoke with Chuck Semborski and Ken Fleck last week before they headed underground for the day. Following are my notes that I took. You know all this, but you can check the facts for me if something is not correct.

*"I called to inquire about any groundwater concerns with the underground water movement post closure. There are two mine ventilation portals in Rilda Canyon. Rilda is the lowest elevation portal. The plan is to install primary bulkheads as an offensive measure to seal/stop the gravity flow, then secondary concrete plugs seal the entrance. There will be pressure transducers behind the bulkheads. They expect about 40-50 psi pressure from the water wanting to flow to the closed portals. After water backs up behind the Rilda bulkheads to an elevation divide, it is expected to gravity flow to the Deer Creek portal and UPDES discharge point. A gravity flow tunnel feature to Deer Creek is also being installed. Goal is no discharge of elevated iron concentration groundwater out of Rilda portals. There may be water rights near there owned by other interests. The reclamation activities in Rilda Canyon will not be "complete" for a period of time to observe for seepage that would affect the canyon.*

*Mine does not want to try to establish a new UPDES discharge point and deal with state & federal regs. Rather, they want to pursue a closure of the current UPDES permit after a sufficient time frame has passed and the water is not degrading the surface streams. There is no fed or state UPDES deminimis permit by rule for surface discharge."*

To summarize, I told Mr. Semborski that there would not be any Utah DWQ Ground Water Protection Section involvement in the closure plan. We may work with them and UPDES in the future for deminimis discharges. The one thing that could change this would be if any post-closure seeps of mine water developing in Rilda Canyon over time.

What I said earlier still holds. My initial and current thought is that it is a groundwater source to begin with, and what is stored in the closed mine is still groundwater. There would not be any permitting associated with it. If the water were to be discharged to the outside ground (new seepage) and meets the Ground Water Quality Standards of R317-6-2, then a permit would not be issued. If the water source is altered or degraded within the mine and then discharged to the ground surface outside the mine (new seepage), then a ground water discharge permit might be required.

Ed Hickey

*Ed Hickey*

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