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Re 8/19/90 Big Mining file

CASTLE VALLEY SPECIAL SERVICE DISTRICT

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December 10, 1990

DORR W. HANSON
Chairman
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RECEIVED
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State of Utah, Oil, Gas & Mining Division
355 West North Temple, 3 Triad Center
Salt Lake City, Utah 84080

DIVISION OF
OIL, GAS & MINING

Re: Co-op Mining Company
Application for Renewal and Addition to
Bear Canyon Mine (ACT/015/025)

Gentlemen:

The Co-op Mining Company published a public notice to renew and add additional land to their Mining Permit. Pursuant to that we have examined the Co-op Mining Company Application and Mine plan on file at the Emery County courthouse.

We believe that our interests in the Big Bear Canyon Spring may be adversely affected by this application. We hereby request that the Division hold an informal conference on the application. As allowed under R 614-300-123.120, we desire to have the conference conducted at the coal mine location.

We are vitally concerned with any effects this action may have upon the quantity and/or quality of our culinary water spring (Big Bear Canyon Spring). This spring is located in the permit area and is used to provide drinking water to the communities of Huntington, Cleveland and Elmo. We fully recognize that Huntington City and the Co-op Mining Company have an agreement in place to protect this spring as a water source. However, the continued decline in our spring flow rates, concerns raised by the mining plan, and the lack of previous monitoring data suggest that significant problems with the spring could occur if additional mining activity is allowed beyond that allowed in the 1980 Mine Plan. If the previous mine plan is expanded then additional assurance that our spring will be protected is needed.

Briefly, the issues we would like to have discussed at the hearing include the following:

1. The decline of flow from the Big Bear Canyon Springs over the past several years.

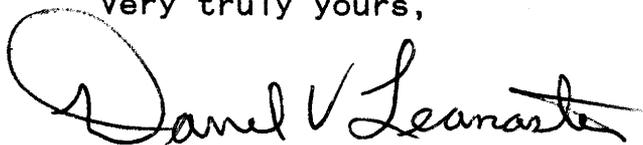
2. The movement of ground water from the recharge area to our springs is in question. Their chapter on Hydrology assumes that ground water flows nearly vertically from the recharge area along fractures and then moves horizontally to the point of discharge at the spring. If the water, in fact, moves on a diagonal line; then their mining operations could intercept the flow. What basis of fact do they have for their assumptions on ground water movement?
3. In the mine plan they discuss the past ground water interceptions at the fault crossings in the East Bleeders Area. We would like to discuss its possible link to diminished spring flows. Also, what effects further mining to the North and east will have upon our spring flows.
4. The possibility of contamination of the spring quality due to mine sump leakage into fractures related to faulting, as well as from flow along the fault needs to be discussed. What steps will be taken to assure that downward movement of mine water along these faults and fractures will not contaminate our springs?
5. Almost all of the past monitoring has been done on the downard (East and North) side of the fault associated with Big Bear Spring. Yet the Mine Plan on page 7-30 indicates that ground water movement is "essentially south to southeast." What steps will be taken to adequately monitor on the upstream side of the fault and in the upstream direction of flow?
6. Past ground water monitoring has been inconsistent and often lacking. What assurance do we have that future performance will be improved? Co-op has indicated some past sampling from our spring and their intentions for future sampling. However, they have never requested permission to sample from the spring and we have no knowledge of any previous sampling. We believe this should be an extremely vital part of the monitoring program and that it should be done with our knowledge and co-operation.

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7. The State of Utah Public Drinking Water Regulations require a 1500 ft protection zone on all lands equal to or above the operation level of the spring. We believe this will restrict all surface and sub-surface activity within 1500 ft of the spring. We would like to discuss this requirement and its effect on the proposed mining operation.

We believe that the above issues justify the scheduling of a conference and request that one be arranged so we might review our concerns. The above comments are very brief. If more specific and detailed comments are required prior to the conference, please let us know.

Very truly yours,



Darrel V. Leamaster, P.E.
District Manager

cc: Gayle Smith, Health Dept
Huntington City
Cleveland Town
Elmo Town
North Emery Water Users Association