



State of Utah  
DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF OIL, GAS AND MINING

1594 West North Temple, Suite 1210  
PO Box 145801  
Salt Lake City, Utah 84114-5801  
(801) 538-5340 telephone  
(801) 359-3940 fax  
(801) 538-7223 TTY  
www.nr.utah.gov

Michael O. Leavitt  
Governor  
Robert L. Morgan  
Executive Director  
Lowell P. Braxton  
Division Director

July 29, 2002

Mr. Wendell Owen, Mine Manager  
Co-Op Mining Company  
P.O. Box 1245  
Huntington, Utah 84528

Re: Water Monitoring Update, Co-Op Mining Company, Bear Canyon Mine, C/015/025 AM  
02G, Outgoing File

Dear Mr. Owen:

The above-referenced amendment has been reviewed. There is one deficiency that must be adequately addressed prior to approval. A copy of our Technical Analysis is enclosed for your information. In order for us to continue to process your application, please respond to this deficiency by August 30, 2002.

If you have any questions, please call me at (801) 538-5325 or Mike Suflita at (801) 538-5259.

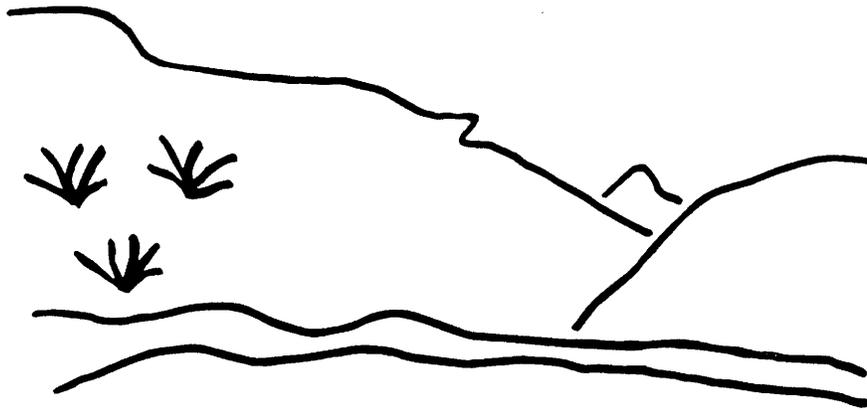
Sincerely,

A handwritten signature in black ink that reads "Daron Haddock".

Daron Haddock  
Permit Supervisor

an  
Enclosure  
cc: Price Field Office  
O:\015025.BCNA\FINAL\DEF02G.DOC

# State of Utah



## Utah Oil Gas and Mining

### Coal Regulatory Program

Bear Canyon Mine  
Water Monitoring Update  
C/015/025-AM02G  
Technical Analysis  
July 29, 2002

INTRODUCTION

---

# TECHNICAL ANALYSIS

## INTRODUCTION

On May 30, 2002 the Division received a proposed amendment to change the water-monitoring plan due to progression of the mining. This is a review of that amendment. There are two deficiencies.

Page 2  
C/015/025-AM02G  
July 29, 2002

INTRODUCTION

---

OPERATION PLAN

---

## OPERATION PLAN

### HYDROLOGIC INFORMATION

**Regulatory Reference:** 30 CFR Sec. 773.17, 774.13, 784.14, 784.16, 784.29, 817.41, 817.42, 817.43, 817.45, 817.49, 817.56, 817.57; R645-300-140, -300-141, -300-142, -300-143, -300-144, -300-145, -300-146, -300-147, -300-148, -301-512, -301-514, -301-521, -301-531, -301-532, -301-533, -301-536, -301-542, -301-720, -301-731, -301-732, -301-733, -301-742, -301-743, -301-750, -301-761, -301-764.

#### Analysis:

##### Ground-water monitoring

The proposed amendment has three changes to the groundwater-monitoring plan. The reasons and rationale for these changes are contained in the cover letter that accompanies the two revised pages and three revised maps. Considering the reasons and rationale, the changes appear approvable. However, those explanations NEED to be included in the Mining and Reclamation Plan (MRP). The MRP is a document explaining the overall operation of the mine, including changes to the plan. That means when changes, such as to water monitoring, are made, the why and wherefore must also be included. Otherwise, the change simply shows up and no one reading the plan knows why. Readers include many varied audiences so this explanation needs to be included.

When providing the changes to the MRP, also include added information, from a Hydrologic standpoint, on why it's appropriate to include flows from the abandoned SBC-13 into the new SBC-11.

#### Findings:

Information provided in the proposed amendment is not considered adequate to meet the requirements of this section. Prior to approval, the Permittee must provide the following in accordance with:

- R645-301-731.200, 1)** Include explanations for the proposed changes in the Mining and Reclamation Plan (MRP), and **2)** Include added information, from a Hydrologic standpoint, on why it's appropriate to include flows from the abandoned SBC-13 into the new SBC-11.