



State of Utah

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TO: Darron Haddock, Permit Supervisor

FROM: Sharon Falvey, Reclamation Specialist

RE: Genwal Coal Company, State Lease Amendment, Crandall Canyon Mine, Carbon County, UT, #015-032

Subject:

The Division received the Genwall State Lease Amendment on December 7, 1990. The amendment proposes to expand the underground mine workings for state lease ML-21568 and ML-21569 an increase in underground disturbance equal to 1680 acres. There are no proposed surface disturbances or operational changes.

Analysis:

On page 14-22 it is indicated that an increase in mine inflow is expected above the present observed rate of 100 gpm. The estimated inflow for the fully developed mine workings is 364 gpm and 300 gpm for ML-21568 and ML-21569 respectively. Yet, the proposal does not refer to use, storage, or treatment of the increased mine water inflow. In the approved plan (pg 7-40), Genwall commits to submitting to DOGM the plan developed for a NPDES permit revision for unexpectedly large inflows of water into the underground workings. There is no indication of how much inflow will be used during operation and, no indication of the point of operation where inflow might exceed use consistently (vs. unexpected large inflow of the NPDES point discharge).

It is noted that on pg. 14-4 the proposal commits to compliance with UMC regulations 817.131 and 817.132. Presently the Division is determining completeness under R614 Coal Mining Rules.

Recommendation:

In light of the aforementioned analysis I feel approval of the proposed amendment can be considered after the following technical deficiencies are provided to the Division:

1. Provide a water budget for mine inflow.

2. Provide the developed plan for NPDES permit concerning unexpected large inflows, as is referred to on pg. 7-40 of the approved MRP.
3. Provide a treatment plan for mine inflow that is not used in the mining process.
4. All references to regulations within the proposal should be changed to reflect the new R614 regulations.