



OGMCOAL DNR <ogmcoal@utah.gov>

Crandall Canyon- Mine Water Discharge Routing to Huntington Creek

Steve Christensen <stevechristensen@utah.gov>

Thu, Nov 15, 2018 at 9:35 AM

To: Jeff Salow <jsalow@fs.fed.us>, Karin Madsen <kmadsen@coalsource.com>, PJ Jensen <pjensen@coalsource.com>

Cc: OGMCOAL DNR <ogmcoal@utah.gov>, Daron Haddock <daronhaddock@utah.gov>, Dana Dean <danadean@utah.gov>, Justin Eatchel <jeatchel@utah.gov>, Jeff Studenka <jstudenka@utah.gov>

Good morning,

We received a letter from the Division of Water Quality (DWQ) regarding the potential routing of mine water from the north portals to Huntington Creek at final reclamation (see attached). The letter from DWQ provides some clarification to questions that have arose since we've been discussing this potential reclamation scenario. I had requested clarification on these issues (see attached letter). In summary, DWQ's rules allow for the relocation of Outfall 002 (mine water discharge) to Huntington Creek.

Going forward, obtaining clarification from the Forest Service in terms of what level of permitting work would be required to facilitate the construction of a pipeline would be the next logical step. Given that the Deer Creek Mine recently constructed a similar pipeline conveyance system, our hope at DOGM is that this will not present too large of a hurdle.

Perhaps a conference call would be beneficial at this point. With Thanksgiving coming up, next week may not be the best choice for the call, but perhaps in the next couple of weeks we can get something scheduled to discuss what the Forest would need/require to keep this project moving forward.

Please call me if you have questions or want to discuss this matter further.

Regards,
Steve

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Steve Christensen
Utah Division of Oil, Gas and Mining
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[Salt Lake City, Utah 84116](mailto:stevechristensen@utah.gov)
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2 attachments

**DWQ CrandCyn_FinRecLetter 11-1-2018.pdf**

89K

**DWQ-2018-012451.pdf**

1419K



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MICHAEL R. STYLER
Executive Director

Division of Oil, Gas and Mining

JOHN R. BAZA
Division Director

November 1, 2018

Jeff Studenka, Environmental Scientist
Utah Division of Water Quality-UPDES Section
P.O. Box 144870
Salt Lake City, Utah 84114

Subject: Crandall Canyon Mine, Genwal Resources, Final Reclamation Plan, C/015/0032

Dear Mr. Studenka:

The Division of Oil, Gas and Mining (DOGM) have been working with Genwal Resources (the Permittee) in revising the final reclamation plan at the Crandall Canyon Mine. The final reclamation plans in the current Mining and Reclamation Plan (MRP) did not contemplate several factors that have developed at the mine site over time. One such issue is the mine water that discharges from the north portals (Outfall 002 per #UTU0024368). It's generally agreed that the mine water discharge will continue for some time into the future. As a result, the MRP must account for how the mine water discharge will be handled upon final reclamation of the site.

One option that is under consideration is a pipeline. A pipeline would be constructed that would route the mine-water discharge from the north mine portals down Crandall Canyon where it would ultimately report to Huntington Creek. I'm writing to you to request some clarification/guidance from the Division of Water Quality's (DWQ) perspective as to what issues and steps should be considered with the pipeline concept. I should clarify that the pipeline would not be constructed until such time as coal mining activity has ceased and final reclamation of the site has been initiated

Questions have arisen such as: 1) Can an existing outfall (in this case 002) be re-located or would it be considered a new outfall? 2) Would the Permittee require a new UPDES permit or could the existing permit be revised? 3) Would the Antidegradation Policy outlined in R317-2-3 preclude the pipeline construction and relocation of Outfall 002 from Crandall Creek to Huntington Creek?

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November 1, 2018

Subject: Crandall Canyon Final Reclamation Plan

DOGM and the Permittee are reluctant to pursue a final reclamation plan design if there are regulatory issues that would preclude its implementation. That said, any guidance and/or clarification from DWQ on the proposed pipeline concept would be greatly appreciated.

If you have any questions, please don't hesitate to call me at (801) 538-5350.

Sincerely,

A handwritten signature in blue ink, appearing to read "Steve Christensen", with a long horizontal flourish extending to the right.

Steve Christensen
Permit Supervisor

SKC/sqs

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State of Utah

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Department of
Environmental Quality

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DIVISION OF WATER QUALITY
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November 13, 2018

Steve Christensen, Permit Supervisor
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PO Box 145801
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stevechristensen@utah.gov

Subject: UPDES Permit No. UT0024368 – Genwal Resources, Crandall Canyon Mine,
Final Reclamation Plan

Dear Mr. Christensen:

On November 1, 2018 the Utah Division of Water Quality (DWQ) received your letter regarding the above referenced facility. Hopefully this correspondence will help answer the questions regarding the proposed pipeline discharge option as described in your letter. Your questions are presented below followed by DWQ's responses, respectively.

Question 1: *Can an existing outfall (in this case 002) be re-located or would it be considered a new outfall?*

DWQ Response: Yes, an existing outfall can be re-located without being considered a new outfall. As you know, the Crandall Canyon Mine is currently authorized to discharge mine water via Outfall 002 with geographic coordinates as specified in UPDES Permit No. UT0024368. Any change in the location of an outfall would need to be reflected in the respective UPDES permit.

Question 2: *Would the Permittee require a new UPDES Permit or could the existing permit be revised?*

DWQ Response: The existing UPDES Permit No. UT0024368 could be revised to reflect a proposed change in the discharging outfall coordinates. This type of revision would be accomplished through DWQ's permit modification procedures in Utah Administrative Code (UAC) R317-8-5.6.

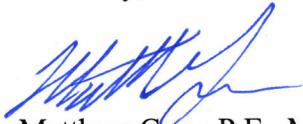
Questions 3: *Would the Antidegradation Policy outlined in (UAC) R317-2-3 preclude the pipeline construction and relocation of Outfall 002 from Crandall Creek to Huntington Creek?*

DWQ Response: No, the Antidegradation Policy outlined in UAC R317-2-3 would not specifically preclude the pipeline construction and relocation of Outfall 002 from Crandall Canyon Creek to Huntington Creek. Once an outfall relocation request was made through the permit modification process as submitted to DWQ, an Antidegradation Review would be performed, following UAC R317-2-3, to ensure in-stream water quality standards are being met and that the beneficial uses of the receiving waters are protected as appropriate. In this case, Crandall Canyon Creek is a tributary to Huntington Creek, both of which are Category 3 waters having the same protected beneficial uses as per UAC R317-2-13.2(b).

Thanks for your coordination efforts with DWQ as the final reclamation plan options are considered for the Genwal Resources Crandall Canyon Mine. Your efforts to help protect Utah's Water Quality are appreciated.

If you have any further questions with regards to this matter, please contact Jeff Studenka at (801) 536-4395 or by e-mail at jstudenka@utah.gov.

Sincerely,



Matthew Garn, P.E., Manager
UPDES Surface Water Section

MG:JAS:lg

cc: Scott Hacking, DEQ District Engineer (email)
Orion Rogers, SE Utah Health Dept. (email)

DWQ-2018-012451