



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

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## Crandall Canyon Mine- Final Reclamation Plan Revision

1 message

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**Steve Christensen** <stevechristensen@utah.gov>

Fri, Nov 23, 2018 at 2:59 PM

To: Jeff Salow &lt;jsalow@fs.fed.us&gt;

Cc: OGMCOAL DNR &lt;ogmcoal@utah.gov&gt;, Dana Dean &lt;danadean@utah.gov&gt;, Daron Haddock &lt;daronhaddock@utah.gov&gt;

Good afternoon,

As we discussed on the phone the other day, I've attached a letter requesting clarification from the Forest Service relative to a potential mine water discharge pipeline at the Crandall Canyon Mine (See attached). A hard copy will be sent out early next week.

Once we receive written clarification from the Forest Service as to what regulatory bases need to be touched for this pipeline project, we'll be able to give the company clear direction on how to proceed.

I appreciate your help with this Jeff. Give me a call if you have any questions.

Regards,  
Steve

p.s. I hope you had a fun and relaxing Thanksgiving.

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Steve Christensen  
Utah Division of Oil, Gas and Mining  
1594 W North Temple, Suite 1210  
Salt Lake City, Utah 84116  
(801) 538-5350  
[stevechristensen@utah.gov](mailto:stevechristensen@utah.gov)

**ForestServ Letter 11-26-2018.pdf**

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# State of Utah

## DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER  
*Executive Director*

### Division of Oil, Gas and Mining

JOHN R. BAZA  
*Division Director*

November 23<sup>rd</sup>, 2018

Jeff Salow, Minerals, Engineering & Lands Staff Officer  
USDA Manti-La Sal National Forest Service  
599 West Price River Road  
Price, Utah 84501

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

Dear Mr. Salow,

The Division of Oil, Gas and Mining (the Division) 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. 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 clarification from the Forest Service's perspective as to what issues and steps would be required to develop and ultimately construct the pipeline. The general concept of the pipeline conveyance system is very similar to that of the recently constructed pipeline at the Deer Creek Mine facility. The pipeline would remain in perpetuity and significant portions of it would be on Forest Service land.

Please provide written clarification as to what would be necessary from the stand point of the Forest Service to facilitate the ultimate construction this pipeline (e.g. additional NEPA analysis, Special Use Permit etc.). The Division and the Permittee are reluctant to pursue a final reclamation plan design if there are regulatory issues that would preclude its implementation. That said, clarification/guidance from the Forest Service on the proposed pipeline concept would be greatly appreciated.

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November 23, 2018

Subject: Crandall Canyon Final Reclamation Plan

It should be noted that the Utah Division of Water Quality (DWQ) has indicated that the construction of the mine water discharge pipeline and re-location of the associated outfall (Outfall 002, #UTU0024368) is allowable under the terms of the Permittee's Utah Pollutant Discharge Elimination System permit (See attached).

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

Sincerely,



Steve Christensen  
Permit Supervisor

SKC/sqs

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State of Utah

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Department of  
Environmental Quality

Alan Matheson  
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DIVISION OF WATER QUALITY  
Erica Brown Gaddis, PhD  
*Director*

November 13, 2018

Steve Christensen, Permit Supervisor  
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Salt Lake City, Utah 84114-5801  
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**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.

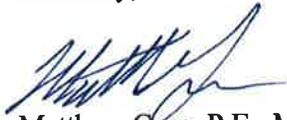
**Questions 3:** *Would the Antidegradation Policy outlined in (UAC) R317-2-3 preclude the pipeline construction and relocation of Outfall 002 from Crandall Creek to Huntington Creek?*

**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](mailto: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