



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

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December 18, 1997

Kenneth E. May, General Manager  
Canyon Fuel Company, LLC  
SUFCO Mine  
397 South 8th West  
Salina, UT 84564

Re: Chapter 7 Revision Amendment to MRP, Canyon Fuel Company, LLC, SUFCO Mine,  
ACT/041/002-97A, Folder #2, Sevier County, Utah

Dear Mr. May:

A review of your submittal dated November 5, 1997 by James Smith, Reclamation Specialist for the Division, indicated the following deficiencies. Please address these deficiencies by no later than January 15, 1998.

**R645-301-731.210, -731.220, -731.214, -731.224**, Canyon Fuel Company needs to demonstrate that monitoring locations and parameters are no longer necessary before the Division will approve modification of the operational monitoring plan. There is no discussion of reasons for discontinuing operational monitoring at surface-water monitoring sites 022 and 030. Total hardness, total alkalinity, dissolved iron, and dissolved manganese are currently included in the operational ground- and surface-water monitoring plans but have been omitted from Tables 7-4 and 7-5 without discussion in either the Chapter 7 revision or Appendix 7-17. Flow measurement is discussed in the text, but for clarity flow measurement should be listed with the parameters in Tables 7-4 and 7-5.

**R645-301-722.100, -731.210**, Quarterly measurement of ground-water levels at US-81-3 should continue, if possible. Canyon Fuel Company indicated in the October 28, 1997 letter that water level measurements are frequently not possible due to collapse or blockage of the casing. However, this information is not in the Chapter 7 revision or Appendix 7-17 in support of the proposal to drop this well from the monitoring plan.

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**R645-301-731.210, -731.220,** In the Chapter 7 revision 047A is listed with the stream-monitoring sites in Table 7-2 and shown as a stream monitoring site on Plate 7-3. However, in Appendix 7-17 this site is identified as a spring in Table A-1, in Figure 17, and in the text on page 68. According to the October 28, 1997 letter from Canyon Fuel Company, monitoring station 047A is in the stream bed and is a surface-water monitoring site. But it is spring fed except during spring runoff or a storm event. This explanation or description of 047A, which helps clarify the apparent discrepancies between Chapter 7 and Appendix 7-17, is not in the Chapter 7 revision.

If you have any questions please call.

Sincerely,



Joseph C. Helfrich  
Permit Supervisor

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cc: pfo  
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