

#4243
OK

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

January 16, 2013

TO: Internal File

THRU: Daron Haddock, Coal Program Manager *DH*

FROM: April A. Abate, Environmental Scientist III and Team Lead *AAA*
11/6/13

RE: South Fork Quitchupah 2R2S, Canyon Fuel Company, SUFCO Mine, Permit C/041/0002, Task #4243

SUMMARY:

On January 4, 2013, Canyon Fuel Company (CFC), the Permittee for the SUFCO mine resubmitted an amendment responding to the remaining deficiencies associated with hydrology identified in a deficiency letter issued to the Permittee on December 6, 2012. During this interim period, the Manti La Sal/Fishlake National Forest issued their concurrence letter on January 9, 2013 indicating that their agency's prior concerns about the project have been addressed in the monitoring and mitigation plan submitted by the Permittee. In the letter, the Manti La-Sal/Fishlake National Forest issued a concurrence letter to proceed with the South Fork of Quitchupah project. In addition, the Forest Service also requested in their letter that all state appropriated water rights be monitored by the Permittee.

The Division identified the following outstanding hydrology-related deficiencies in the December 6, 2012 letter:

[R645-301.731.530]: Water Right 94-113 was found to be small undeveloped seep. The PHC recommended a total of six springs be monitored along the reach of the South Fork of Quitchupah. The seep associated with Water Right No. 94-113, was not included in this group. The location of this seep is approximately 500 feet off the northwest edge of the 2R2S panel (refer to Plate 7-2Av6). Because this is a state appropriated water right and located within the angle of draw where subsidence cracks are possible, please include this seep in the water monitoring protocol.

[R645-301.731.224]: The downstream surface water monitoring point 006D should be added to Figure 7-9 in the MRP and included in the gain/loss surveys to be completed as part of the mitigation plan.

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FINDINGS:

The Permittee has adequately addressed the hydrology deficiencies and meets the Utah Coal Rules.

RECOMMENDATIONS:

Approval is recommended.

TECHNICAL ANALYSIS:

OPERATION PLAN

HYDROLOGIC RESOURCE INFORMATION

Regulatory Reference: 30 CFR Sec. 701.5, 784.14; R645-100-200, -301-724.

Analysis:

Groundwater & Surface Water Monitoring Plans

The Division requested that the Permittee add downstream surface water monitoring point 006D to Figure 7-9 in the MRP and include this monitoring location in the gain/loss surveys to be completed as part of the mitigation plan. The Permittee responded to this request by adding monitoring point 006D to Figure 7-9, page 7-51K of the MRP. The Permittee has also included monitoring point 006D in the gain/loss survey studies that will be undertaken as part of the project.

State-Appropriate Water Supply

The Division requested that Water Right No. 94-113 located in T21S R4E, Section 23 be included in the water monitoring program for the South Fork of Quitchupah creek. Because this small seep is listed as a state-appropriated water right and its location being close to the edge of the 2R2S panel to be mined, the Division as well as the Forest Service, as stated in their concurrence letter, required that it be monitored. The Permittee has included the Seep 94-113 and has added the location to Table 7-2 Water Monitoring Program table in page 7-42A of the MRP. Plate 7-3 has been modified to include the Seep 94-113 on the Hydrologic Monitoring Stations map.

Findings:

The Permittee has adequately addressed the hydrology deficiencies and meets the Utah Coal Rules.

RECOMMENDATIONS:

Approval is recommended.