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State of Utah

DEPARTMENT OF NATURAL RESOURCES

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Division of Oil, Gas and Mining

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Division Director

April 8, 2020

John Byars, General Manager
Canyon Fuel Company, LLC
597 South SR24
Salina, Utah 84654

Subject: Water Monitoring Revisions, Canyon Fuel Company, LLC, Sufco Mine, C/041/0002, Task #6086

Dear Mr. Byars:

The Division has reviewed your application. The Division has identified deficiencies that must be addressed before final approval can be granted. The deficiencies are listed as an attachment to this letter.

The deficiencies authors are identified so that your staff can communicate directly with that individual should questions arise. The plans as submitted are denied. Please resubmit the entire application.

If you have any questions, please call me at (385) 290-9937.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Christensen".

Steve Christensen
Coal Program Manager

SKC/sqs
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Technical Analysis and Findings

Utah Coal Regulatory Program

PID: C0410002
TaskID: 6086
Mine Name: SUFCO MINE
Title: WATER MONITORING REVISIONS

Operation Plan

Hydrologic Ground Water Monitoring

Analysis:

The amendment does not meet the State of Utah R645 Hydrologic: Ground Water Monitoring.

On March 11, 2020 the Division received an application to amend the Sufco MRP to revise the current water monitoring program. As part of the groundwater monitoring section of the MRP this application proposes 5 groundwater wells be removed as monitoring points, 9 springs be removed, and 25 springs have their monitoring protocols revised. The proposed revisions to monitoring protocols include changing some full operational laboratory quality testing to the minimum R645 laboratory and field testing (i.e. flow, temperature, pH, conductivity/TDS, total iron and total manganese). The Permittee has also proposed removing 1st quarter monitoring from most sites as all monitoring sites on the plateaus above mining are inaccessible during those months.

Justification for the removal of these sites and the revision of monitoring protocols has not been provided to the Division. This justification must include an analysis of the data collection at each site that is to have a reduction in monitoring or a removal from the program.

Deficiencies Details:

The amendment does not meet the State of Utah R645 requirements for Ground Water Monitoring. The following deficiency must be addressed prior to final approval:

R645-301-731.214 Justification for the removal of ground water monitoring sites, as well as the proposed reduction in monitoring protocols, must be provided to the Division. This justification must include an analysis of the data collected at each site that is proposed for reduced monitoring or removal from the monitoring program.

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Hydro Surface Water Monitoring

Analysis:

The amendment does not meet the State of Utah R645 Hydrologic: Surface Water Monitoring.

On March 11, 2020 the Division received an application to amend the Sufco MRP to revise the current water monitoring program. As part of the surface water monitoring section of the MRP this application proposes the removal of 2 stream monitoring sites, and the revision of 20 stream monitoring protocols. The revision of these protocols includes some sites be reduces to monitoring field parameters only, some include only minimum laboratory quality parameters (i.e. flow, temperature, pH, conductivity/TDS, TSS, total iron and total manganese), and that 1st quarter monitoring no longer being

required for sites that are typically inaccessible during 1st quarter due to their high elevations and are snow covered during those months.

Justification for the removal of these sites and the revision of monitoring protocols has not been provided to the Division. This justification must include an analysis of the data collection at each site that is to have a reduction in monitoring or a removal from the program.

Deficiencies Details:

The amendment does not meet the State of Utah R645 requirements for Surface Water Monitoring. The following deficiency must be addressed prior to final approval:

R645-301-731.224 Justification for the removal of stream monitoring sites, as well as the proposed reduction in monitoring protocols, must be provided to the Division. This justification must include an analysis of the data collected at each site that is proposed for reduced monitoring or removal from the monitoring program.

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Maps Monitoring and Sampling Locations

Analysis:

The amendment does not meet the State of Utah R645 Maps, Monitoring and Sampling Locations.

On March 11, 2020 the Division received an application to amend the Sufco MRP to revise the current water monitoring program. However, as part of this amendment, updated monitoring maps were not provided. The water monitoring maps must be updated to remove the sites that are proposed to no longer be a part of the monitoring program.

Deficiencies Details:

The amendment does not meet the State of Utah R645 requirements for Maps, Monitoring and Sampling Locations. The following deficiency must be addressed prior to final approval:

R645-301-731.730 Updated water monitoring maps were not provided in this application. The water monitoring maps must be updated to remove the sites that are proposed to no longer be a part of the monitoring program.

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