0037

WATER QUALITY MEMORANDUM

OK

Utah Coal Regulatory Program

July 19, 2004

TO: Internal File

THRU: Wayne Hedberg, Permit Supervisor

FROM: Gregg A. Galecki, Reclamation Specialist III

RE: 2004 First Quarter Water Monitoring, Canyon Fuel Company, LLC, Skyline Mine, C/007/0005-WQ04-1, Task ID #1832

1. Was data submitted for all of the MRP required sites? YES [x] NO [ ]

Identify sites not monitored and reason why, if known:

Data was submitted for all surface-water, groundwater, and UPDES sites. The required first quarter monitoring is greatly reduced at the Skyline Mine. A majority of the sites are inaccessible during winter and the MRP follows a three (3) season monitoring plan. Sites CS-3, CS-9, and CS-11 were documented at having 'No Access'. These three (3) sites have not been accessible during the first quarter due to snow, ice, and winter conditions for at least the last four (4) years. These sites could be considered candidates for the three (3) season sampling program due to their limited accessibility.

2. On what date does the MRP require a five-year resampling of baseline water data.

Renewal of the permit is April 30, 2007. The MRP makes no commitment to sampling baseline water parameters one year prior to the renewal date. No baseline parameters are even outlined. Operational parameters are the only parameters ever collected.

Permit Renewal date 30April07

3. Were all required parameters reported for each site? YES [x] NO [ ]

4. Were irregularities found in the data? YES [x] NO [ ]

Mine #3 is no longer pumping water, as evident by CS-12 having No Flow since September 2003. MD-1, which is a composite of CS-12 and CS-14 averaged flows of 945 gpm for the quarter with a TDS of 430 mg/l, which is down from 5,230 gpm last quarter.

Stream site CS-2, located adjacent to the highway, illustrated elevated concentrations of dissolved Ca, K, Na, Cl, and SO4. Sites CS-4 and CS-11, also located adjacent to the highway, had elevated concentrations of sodium and chloride in the samples collected on November 11, 2003, but were not sampled this quarter. The elevated values may be attributed to UDOT and possibly adding salt to the road. The condition will continue to be monitored.

With mining being temporarily suspended, and the flooding of mine workings, mine discharge to Eccles Creek has been significantly decreased. Notable flow reductions include CS-2 8120 gpm (Sept03) to 1820gpm, and CS-14 4050 (Nov03) to 1745gpm. The monitoring of Mud Creek has also seen similar reductions in flow, which are 1/3 to ½ the flows seen last fall. No changes in water quality have been observed with the decreased flows. This condition will continue to be monitored.

5. Were DMR forms submitted for all required sites?

1st month, YES [x] NO [ ]
2nd month, YES [x] NO [ ]
3rd month, YES [x] NO [ ]

All the information was submitted electronically.

6. Were all required DMR parameters reported? YES [x] NO [ ]

Discharges were recorded from both the Portal (001) and the Loadout (002) sediment ponds. Discharge was continuous from the Portal. Weekly sampling produced an average flow of 885 gpm, average TDS of 653 mg/l, and an average T-Fe value of 0.48 mg/l. The Skyline permit requires TDS to be below 500 mg/l with unlimited flow or a total daily load of less than 7-tons TDS. The largest daily load noted was approximately 6.4 tons – no exceedances of the permit were noted during the quarter. Discharge from the Loadout (002) was minimal with a flow of 5 gpm and TDS value of 279 mg/l.

Based on continuous flow data supplied by Skyline Mine personnel, discharge to Eccles Creek averaged 1,017 gpm (5,375 gpm last quarter), while pumping of JC-1 averaged 3,902 gpm

(3,988 gpm last quarter), and JC-3 averaged 3,117 gpm (2,465 gpm last quarter) to Electric Lake (7,019 gpm total). JC-1 is a 'mine dewatering' well and does not require a UPDES permit.

7. Were irregularities found in the DMR data? YES [ ] NO [x]

The sediment pond discharges continually and is sampled, at a minimum, once a week. Discharge fluctuated widely during the quarter based on JC-3 being activated and discharging water to Electric Lake. Discharges into Eccles Creek ranged from approximately 3,024 gpm when JC-3 was not pumping, to as low as approximately 300 gpm when it was pumping.

8. Based on your review, what further actions, if any, do you recommend?

No further action is necessary for the 2004 1st (04-1) Quarter Water Monitoring data.

an
O:\007005.SKY\WATER QUALITY\GAGWQ04-1_1832.DOC