

WATER QUALITY MEMORANDUM

Utah Coal Regulatory Program

January 13, 2004

TO: Internal File

THRU: Daron R. Haddock, Permit Supervisor

FROM: David W. Darby, Senior Reclamation Specialist

RE: 2003, 1st Quarter Water Monitoring, Hiawatha Mine Complex, C/007/0011-WQ03-1, Task ID #1804

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

Identify sites not monitored and reason why, if known:

Data was not submitted during the first quarter for streams. The operator states in the monitoring plan that monitoring streams will occur on a monthly basis when accessible. There were no letters or calls to identify if the sites were accessible. No spring monitoring is required for the first quarter.

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

See Technical Directive 004 for baseline resampling requirements. Consider the five-year baseline resubmittal when responding to question one above. Indicate if the MRP does not have such a requirement.

Resampling due date

Is not specified

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

Comments, including identity of monitoring site:

The first quarter surface data was not collected, because no surface water monitoring took place. The active mine plan for the first quarter identified that the operator would monitor on a monthly basis when accessible. The operator may not think any monitoring is necessary if the weather is poor. The operator was warned on January 14, 2004 that attempts need to be made to monitor the sites, and that those attempts need to be documented.

Hiawatha is currently operating under a new monitoring plan as of June 6, 2003. The monitoring schedule was accepted by Gregg Galecki in compliance to a Division Order for Hiawatha Mine. The Division Order required Hiawatha to update the PHC and organize the plan.

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

Comments, including identity of monitoring site:

No surface data available.

5. Were DMR forms submitted for all required sites?

1st month, YES [X] NO []

2nd month, YES [X] NO []

3rd month, YES [X] NO []

Identify sites and months not monitored:

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

Comments, including identity of monitoring site:

No discharges recorded.

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

Comments, including identity of monitoring site:

No discharges recorded.

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

The warning given to the operator is overshadowed somewhat by the change to the monitoring schedule adopted in June 2003, which shows that monitoring will take place during the months of April through October, Table 7-17, Page 7-96.