

WATER QUALITY MEMORANDUM

Utah Coal Regulatory Program

November 3, 2009

TO: Internal File

THRU: James D. Smith, Permit Supervisor *JS 11/04/09*

FROM: April A. Abate, Environmental Scientist II *AAA 11-4-09*

RE: 2009 2nd Quarter Water Monitoring, Hiawatha Coal Company (HCC), Hiawatha Mine, C/007/0011-WQ09-02 Task #3314

HCC has supplied schedules for water monitoring and parameter reporting in Tables 7-12 through 7-17, in the Mining and Reclamation Plan (MRP), updated on June 6, 2003. Water monitoring locations can be found on Plates 7-1 and 7-2 in the Hiawatha MRP.

The Hiawatha Mine is currently not producing coal from the underground mine. There is currently no underground mining taking place. Coal fines are mined from Slurry Pond 1 and blended with fines from the Bear Canyon mine when market conditions are favorable.

1. Was data submitted for all of the MRP required sites? YES [X] NO []
Identify sites not monitored and reason why, if known:

Springs HCC monitors six springs at the minesite, SP-2, SP-4, SP-5, SP-11, SP-12 and SP-13. Operational sampling is established in the MRP as two times per year, for spring sites, in June and October. Operational parameters were sampled for in June 2009.

Streams HCC monitors 10 stream locations at/near the mine site, ST-1, ST-2, ST-2B, ST-3, ST-3A, ST-3B, ST-4, ST-4A, ST-4B, and ST-5. HCC currently monitors field parameters of streams on a monthly basis from April through October, (Table 7-16). Field parameters were collected in May and June for all stream sample sites. Stream sample location ST-4 was reported as dry for the entire monitoring period. Operational parameters were collected in April from the only flowing stream sample location ST-5.

UPDES There are a total of 13 UPDES sample locations listed in Permit #UT0023094 for the Hiawatha Mine used to establish discharge quality. UPDES locations are monitored monthly according to Table 7-13. Only two sites have yielded flow (D001 and D002). The UPDES locations D003 through D013 are listed in the current UPDES permit, which is due to expire on September 30, 2009. All UPDES sample locations are outlined below:

Pond No.	Location
D001	Mohrland Portal
D002	Overflow at Hiawatha
D003	Upper Coal Storage Yard
D004	North of Slurry Pond No. 1
D005	East of Slurry Pond No. 4
D006	North East of Slurry Pond No. 5
D007	South East of Slurry Pond No. 5
D008	Middle Fork Mine Yard
D009	South Fork Mine Yard
D011	South Fork Truck Loading Facility
D012	Mohrland Pipeline Drain
D013	King 6 Water Tank Overflow

During the second quarter of 2009, only D001 and D002 yielded flow.

2. Were all required parameters reported for each site?

Springs YES NO
Not applicable

Streams YES NO
Total suspended solids (TSS) data for this sample was not submitted.

UPDES YES NO
Field parameters for D002 were not submitted for the month of June, with the exception of flow data.

3. Were irregularities found in the data?

Springs YES NO

Streams YES NO

UPDES YES NO

Conductivity in sample D001 was significantly lower than past results.

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

No baseline sampling obligations are stipulated in the Hiawatha MRP.

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

Review data from UPDES sample site D001 and verify the conductivity value from the June sampling event is correct.

6. Does the Mine Operator need to submit more information to fulfill this quarter's monitoring requirements? [X] Yes [] No

No field parameters were collected from UPDES sample site D002 other than flow during the June 2009 sampling event. Please ensure they are collected or if they are collected, that the Division receives the data.

TSS data was not collected at stream sample ST-5. Please ensure that TSS is monitored in April and September of each year as part of the operational monitoring requirements.

7. Follow-up from last quarter, if necessary.

None.