

WATER QUALITY MEMORANDUM

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Utah Coal Regulatory Program

May 7, 2008

TO: Internal File

FROM: James D. Smith, Environmental Scientist – Hydrology, Permit Supervisor JS 05/08/08

RE: 2008 First Quarter Water Monitoring, Nevada Electric Investment Corporation, Wellington Preparation Plant, C/007/0012, Task ID #2676

The Wellington Preparation Plant is currently idle. No mining or coal processing activities currently take place there, nor is the site in active reclamation. Water-monitoring requirements are in Sections 7.23 and 7.31.2 through 7.31.22, and Tables 7.24-2 and 7.24-5 of the MRP.

1. On what date does the MRP require a five-year re-sampling of baseline water data.

Baseline parameters will be collected in the year preceding permit renewal. The next renewal submittal is due 08/10/09 and the next renewal is due 12/10/09, so five-year resampling should be done in 2008.

2. Were data submitted for all of the MRP required sites?

There is no spring or in-mine monitoring at this site.

Streams and Ponds

YES NO

The Permittee is required to analyze samples from streams at SW-1, SW-2A, SW-3, and SW-4 and from ponds at SW-5, SW-6, SW-7, and SW-8 for the parameters in Table 7.24-5, and to measure flow only at SW-2. In addition, samples from SW-4 and SW-5 are to also be analyzed for benzene, toluene, ethylbenzene, xylene, and naphthalene (BTEXN) and propylene glycol. Monitoring is to be done quarterly.

SW-3, SW-4, and all the ponds were dry during the first quarter 2008.

Wells

YES NO

The Permittee is required to analyze samples from GW-1, GW-3, GW-4, GW-6, GW-7, GW-8, GW-9, GW-9B, GW-10, GW-12, GW-13, GW-14, GW-15A, GW-15B, GW-16, and GW-17 for the parameters in Table 7.24-2, and to measure depth only at GW-2. In addition, samples from GW-4 and GW-6 are to also be analyzed for BTEXN and propylene glycol. Monitoring is to be done quarterly.

There was insufficient water to collect a sample for analysis at GW-3, GW-13 and GW-17 during the first quarter 2008.

UPDES YES NO

Six UPDES permitted outfalls at the Wellington Preparation Plant are monitored monthly: #UTG040010-003, 004, 005, 006, 007, and 008. There was no reported flow at any of the UPDES sites during the first quarter 2008.

3. Were all required parameters reported for each site?

Streams and Ponds YES NO

SW-3, SW-4, and all the ponds were dry during the first quarter 2008.

Wells YES NO

Static water level was measured but inflow was not sufficient to allow purging and sampling at GW-3, GW-13, and GW-17 during the first quarter 2008.

UPDES YES NO

4. Were any irregularities found in the data?

Listed parameters were more than two standard deviations from the mean. An asterisk (*) indicates this is not a parameter specifically required by the MRP.

Streams and Ponds YES NO

Wells YES NO

Parameter	Wells
Field Specific Conductivity	GW-15B
Lab specific conductivity	GW-15A, GW-15B
Bicarbonate as CaCO ₃	GW-6, GW-9B
Total alkalinity	GW-15A
Sulfate	GW-15A, GW-15B
Dissolved Mg	GW- 6, GW-16
Dissolved Na	GW-1, GW-15B, GW-16
Dissolved K	GW-15A, GW-15B
Total anions*	GW-9B, GW-15A, GW-15B
Total cations*	GW-16
TDS	GW-15A
Cl	GW-15B

Dissolved solids have been increasing in GW-12 almost since this well was completed (see attached chart). The reason for this increase is not evident. The well was not accessible during the fourth quarter 2007 and first quarter 2008 because it was inundated by irrigation water: excess irrigation water could be influencing the water in this well.

Several parameters have been outside two standard deviations from the mean at GW-15A and GW-15B, although values do not appear to be extreme or changing rapidly. A chart for GW-15A is included below: data for GW-15B are similar.

UPDES YES NO

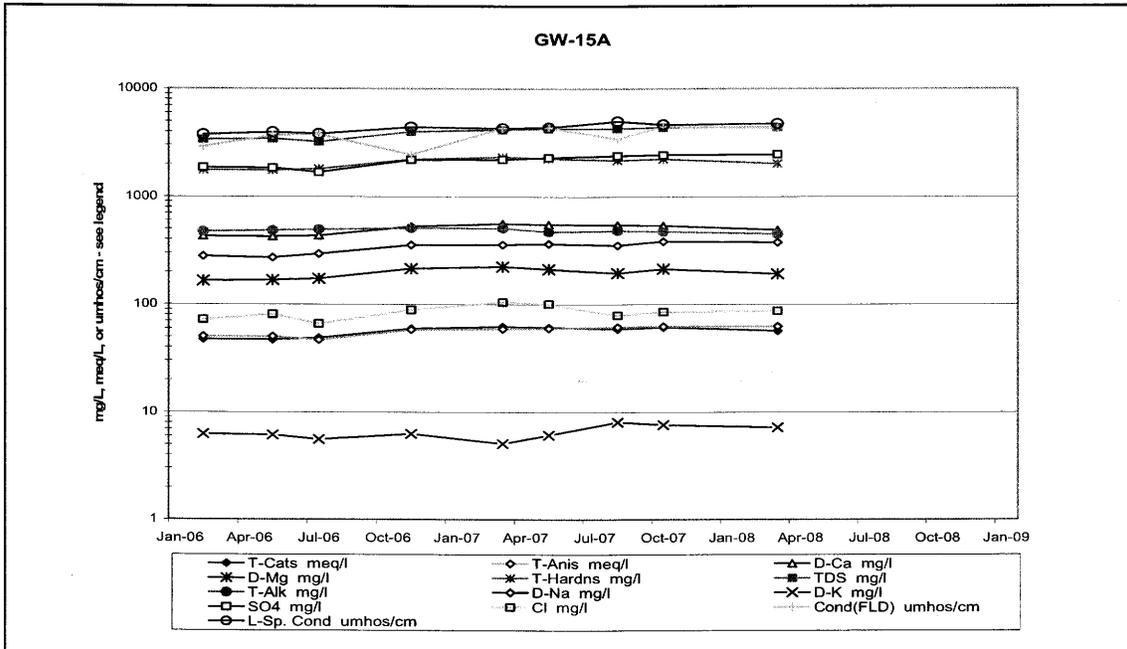
5. Did the Permittee make a timely submittal of all data, including initially missing data, and satisfactorily explain irregular data? YES NO

6. Does the Mine Permittee need to submit more information to fulfill this quarter's monitoring requirements? YES NO

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

Baseline parameters are to be collected in the year preceding permit renewal. The next renewal submittal is due 08/10/09 and the next renewal is due 12/10/09, so analyses for all baseline parameters need to be done this year (2008).

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



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