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From: April Abate
To: Patrick Collins
CC: Jim Smith; Karla Knoop; OGMCOAL@utah.gov; Steve Demczak; Tony Garcia
Date: 11/24/2008 9:04 AM
Subject: Re: Water Monitoring Reports 2nd & 3rd Quarter 2008
Place: OGMCOAL@utah.gov
Attachments: April Abate.vcf

Good morning Patrick,

In response to your email below, I have reviewed the historical data showing that the last baseline sampling event did indeed occur in Jan 2004. Based on the 5-year timetable, you are fine to proceed with your original plan to conduct the baseline sampling in January 2009. As far as discontinuing sampling the baseline parameters, in reviewing the data, the baseline parameters consist of dissolved heavy metals, oil & grease, and compounds associated with fertilizers. The analytical data showed that these compounds were either non-detect or close to non-detect. If NEICO wanted to submit an amendment to discontinue sampling, the Division would have to evaluate it and make a determination; but that is a business decision for NEICO, I suppose.

Thank you for providing some background information on the upgradient well couplet GW-15A and GW-15B. The information you provided in the email is sufficient. I was looking for some background information for my own edification as I get more and more familiar with this site. In the meantime, I will keep monitoring the TDS trends in GW-12.

In summary, we have established that NEICO is on track to conduct the 5-year baseline sampling event in January 2009 as required in the MRP. No additional actions are necessary at this time.

Thanks again for your response, Patrick. Have a nice Thanksgiving holiday.
April

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>>> Patrick Collins <mt.nebo@xmission.com> 11/20/2008 6:15 PM >>>
Hello April:

Thank you for meeting with us at Wellington and for the prompt review of our water quality data. In response to your questions and comments:

Baseline Water Data

Wellington's MRP commitment is to include baseline data parameters at 5-year intervals. Our records show these parameters were measured in the 1st quarter of 2004. Therefore, we planned on sampling for this parameters again in the 1st quarter of 2009. We have already sampled the 4th quarter of 2008. We could notify the lab and have them add some of these parameters, but others would have to be re-sampled due to the short holding times necessary. Re-sampling, of course is possible, but would be expensive.

There was some discussion with the Division hydrologist back in 2004 that maybe these baseline parameters should be discontinued until operations are once again resumed at Wellington (I have memos to support this), but I do not think that discussion was followed by a formal request by NEICO or permission granted by the Division to do so. Our MRP continues to show the 5-year period for baseline parameters in the verbiage.

Groundwater Wells GW-15A & GW-15B

Water monitoring wells GW-15A & GW-15B are indeed a couplet and adjacent to one another for our sampling regime. As for an explanation for the changes of 2 standard deviations, these wells are up-gradient from us and the Wellington site does not influence the results. The changes may be due to variety of reasons i.e. irrigation, precipitation patterns, runoff, etc., but they measure background or natural conditions of which we have no control. If, however, you have a need or reason this subject should be pursued from a regulatory point-of-view, please let us know and we will discuss it further.

Groundwater Well GW-12

You mentioned a "sharp drop in TDS concentrations" for this well.in your November 19, 2008 memo attached to your email. I'm sure Karla Knoop, our hydrologist, can provide you with an explanation for this if you would like her to proceed with it.

Summary

Unless you disagree, I would prefer to continue with our present plan to monitor the full baseline suite of water parameters in the 1st quarter of 2009. We will change this schedule if necessary.

I see no reason to pursue reasons for changes in up-gradient monitoring wells GW-15A & 15B, but will do so if you want our hydrologist to do so.

Karla can provide her thoughts to you on the TDS concentrations of GW-12 if you want her to do so.

Again April, thank you for your timely response welcome aboard!

Sincerely,

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April Abate wrote:

Hello Patrick,

It was good to meet you on Tuesday and get a tour of the Wellington site. I had the opportunity to review the water monitoring data for the 2nd and 3rd quarters. Attached please find the reports summarizing the data evaluation. For wells 15A and 15B, it seems as if there are a lot of parameters outside of 2 standard deviation limits. Is there anything unusual happening with these wells? Are they a couplet (i.e., adjacent to each other and measuring shallow and deep groundwater?). As I recommended in one of the reports, if you could provide some explanation as to what may be happening with these wells, that would be appreciated.

Another important point I want to make is that you are due for permit renewal in 2009, which requires you to resample for ALL baseline parameters in 2008. I notice that has not occurred in Q1, Q2, and Q3 of 2008. Were you planning to conduct the full baseline sampling in the fourth quarter? I just wanted you to be aware of this requirement, if you were not already.

Please call me if you have any questions about these matters or would like to discuss them further.

Regards,

April

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