

WATER QUALITY MEMORANDUM Utah Coal Regulatory Program

March 28, 2019

TO: Internal File

THRU: Steve Christensen, Permit Supervisor 

FROM: Keenan Storrar, Hydrologist 

RE: Third Quarter 2018 Water Monitoring, UtahAmerican Energy Inc., Horse Canyon Complex, C/007/0013, Task ID #5795

Lila Canyon Mine

UEI received permit approval for the Lila Canyon Mine on May 18, 2007 with special conditions attached. The Conditions were clarified on August 3, 2007. Operational water monitoring is described in Section 731.200 and monitoring sites are listed in Table 7-3 of the Lila Canyon MRP. Table 7-4 and Table 7-5 list the monitoring parameters for surface water and groundwater, respectively, and Plate 7-4 shows the water monitoring sites. The list of parameters for baseline, operational and post-mining water monitoring are the same.

1. Were data submitted for all required sites?

Springs YES NO

Operational monitoring for Lila Canyon includes quarterly monitoring at springs L-7-G, L-8-G, L-9-G, L-11-G, L-12-G, L-16-G and L-17-G. Springs L-11-G and L-7-G reported flow while all others were dry this quarter.

Streams YES NO

Surface water (stream) sites are monitored quarterly. Sites L-1-S, L-2-S, L-3-S, and L-19-S are identified for surface water monitoring for the Lila Canyon Mine.

Stream monitoring sites were monitored according to the schedule. Lila Canyon had about 2 CFS this quarter.

Wells YES NO

The wells IPA-1 and IPA-2 are monitored for depth this quarter.

UPDES YES NO

Discharges from the Lila Canyon Mine are authorized under UPDES Permit No. UTG040024. The Lila Canyon Mine UPDES permit identifies two discharges: 001 is discharge from the sediment pond and 002 is discharge from the underground mine. These discharges are being monitored as sites L-4-S and L-5-G, respectively. The UPDES permit specifies monitoring frequency and required parameters. The underground mine and sediment pond are constructed but not discharging.

L-5-G discharged this quarter. L-4-S, the sediment pond, did not discharge.

2. Were all required parameters reported for each site?

Springs	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
Streams	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
Wells	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
UPDES	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>

3. Were irregularities found in the data?

The following sites reported parameters more than two standard deviations above the mean:

Springs	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
Streams	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
Wells	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>

IPA-1 water level continues to be lower than the mean level

UPDES	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
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L-5-G (UPDES 002) has high TDS and TSS for this quarter. TSS exceeded the monthly average permitted limit of 25 mg/L twice in the months of July and August. Between March 2018 and January 2019 the outfall exceeded TSS for Mine Water Discharge a total of seven times. These repeated exceedances resulted in DEQ sending a 'Letter of Violation and Non-Compliance with UPDES Permit Limits'.

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

Re-sampling for baseline parameters is due preceding permit renewal. Analysis of baseline water samples is conducted according to the operational monitoring plan, therefore no additional parameters are required for baseline monitoring.

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

No further action required at this time.

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

None