

WATER QUALITY MEMORANDUM

Utah Coal Regulatory Program

May 2, 2006

TO: Internal File

THRU: D. Wayne Hedberg, Permit Supervisor

FROM: Steve Fluke, Reclamation Hydrogeologist

RE: 2005 Second Quarter Water Monitoring, Canyon Fuel Company, Gordon Creek 2, 7, & 8, C/007/0016-WQ05-2, Task ID #2507

1. Was data submitted for all required monitoring sites? YES [X] NO []

The Gordon Creek 2, 7, & 8 Mine is inactive and mostly reclaimed. The mine is awaiting appropriate conditions to apply for Phase II Bond Release. Until the mine receives Phase II Bond Release, water quality samples are to be collected and analyzed quarterly at seven surface water monitoring sites including one UPDES site at the sediment pond discharge. Water monitoring data is evaluated from the data that is submitted quarterly by the mine to the Division EDI database. The water monitoring plan is presented in Section 7.2.6, Water Monitoring – Until Phase II Bond Release, of the mine’s MRP (p. 7-27). Water quality parameters are outlined in Table 7-18 of the mine’s MRP.

Surface *Sampling is required quarterly for five ephemeral stream monitoring sites (2-7-W, 2-8-W, 2-9-W, 2-10-W, and 2-11-W) and one intermittent stream monitoring site (2-2 W).*

No flow was reported for three of the ephemeral stream monitoring sites (2-7-W, 2-9-W, and 2-11-W). All required data was submitted for two ephemeral sites with reported flow (2-7-W and 2-10-W) and the intermittent stream monitoring site (2-2 W).

UPDES *Sampling is required monthly for one active UPDES site (UTG040004-001).*

No flow was reported for the UPDES site.

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

Surface All required parameters were reported.

UPDES No flow reported.

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

Surface 2-8-W: high concentrations of sulfate, TDS and total hardness were reported. This was the most significant flow since 2000 and the high parameters could be the result of the recent drought.

UPDES No flow.

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

The MRP does not require a five-year resampling of baseline water data.

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

Surface Continue monitoring elevated parameter concentrations in 2-8-W for trends.

UPDES No further action is recommended.

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

7. Follow-up from last quarter, if necessary. Did the Mine Operator submit or provide an explanation for missing and/or irregular data?

NA