

# WATER QUALITY MEMORANDUM

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Utah Coal Regulatory Program

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December 1, 2008

TO: Internal File

THRU: James D. Smith, Permit Supervisor *DS 02/12/08*

FROM: April A. Abate, Environmental Scientist II *AAA 12/1/08*

SUBJECT: 2008 Second Quarter Water Monitoring, Andalex Resources, Centennial Mine, C/007/0019, Task ID #2695

The Centennial Mine is currently in temporary cessation. No mining or coal processing activities currently take place there, nor is the site in active reclamation.

In June 2007, the Division of Oil, Gas, and Mining (the Division) conditionally-approved an amendment to revise the existing operational water monitoring requirements. JBR Environmental Consultants (JBR) of Sandy, Utah prepared a water monitoring plan on behalf of Andalex Resources, L.L.C. (the Permittee). The purpose of submitting the water-monitoring plan was to correct discrepancies identified by Division personnel within the MRP and revise the existing water monitoring operational requirements at the Centennial mine. Water-monitoring requirements are presently located in Sections 711.300 pages 7-2 through 7-10 and Appendix L of the MRP. Water sampling locations are shown on Figure IV-11.

The water monitoring plan prepared by JBR is intended to supercede the existing sections of the MRP pertaining to water monitoring. The Division has notified the Permittee regarding the outstanding amendment and the Permittee has indicated that they intend to finalize the amendment in order to implement the new water monitoring plan prepared by JBR by the end of 2008. Presumably, the new water monitoring plan will go into effect as of first quarter 2009.

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

**Springs**

YES  NO

Spring B351 below the stock pond was the only spring flowing this second quarter that could be sampled. However, the sample data indicate that hardness was not analyzed for. Under the existing water monitoring plan, hardness is not a required parameter. Hardness will be required once the new water monitoring plan is implemented.

**Streams** YES  NO

Streams that were reported as not flowing during the second quarter of 2008 were: 8-1, 17-2, 18-2, 18-4, 25-2. All others were sampled in accordance with the existing water monitoring plan.

**Wells** YES  NO

Well #1 was dry.

**UPDES** YES  NO

No discharge from sample locations 001, 002, and 003 were reported for the second quarter of 2008. Data were submitted from sample location 004, Aberdeen Mine Discharge point.

**Pond** YES  NO

The stock watering pond, 31-1 sampling location was reported as not flowing during the second quarter of 2008.

**2. Were all required parameters reported for each site?**

**Springs and Pond** YES  NO

See comment under Item #1.

**Streams** YES  NO

Flow data was not reported from sample location 7-1, Right Fork Deadman Wash AB Mine.

**Wells** YES  NO

Not applicable this quarter.

**UPDES** YES  NO

Where applicable

**3. 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.

**Springs and Pond** YES  NO

**Streams** YES  NO

B263 INTERMEDIATE REACH OF BUCK/DEEP Canyon reported results outside the two standard deviation limits for dissolved oxygen and chloride.  
Total iron was report outside the two standard deviation limit for 18-3, Left Fork Deadman Wash BL Mine

**Wells** YES  NO   
Not applicable this quarter.

**UPDES** YES  NO

Discharges were reported from sampling location point 004. Based on the data reported from this sample point for the second quarter of 2008, the concentration of total iron was outside the two standard deviation limit. Total Dissolved Solids (TDS) averaged 1,822 milligrams per liter (mg/L) in a 30-day period. The 30-day average discharge limitation under the mine UPDES Permit is 500 mg/L. However, the permit indicates that if each outfall cannot achieve a 30-day TDS average of 500 mg/L, then the Permittee is limited to one ton (2,000 lbs) per day as the sum from all outfalls. The Permittee is well within these requirements.

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

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

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

Stream sampling point locations 17-1, 17-2, 8-1, 25-2 and spring sampling location S25-1 were conditionally approved by the Division to be eliminated from the monitoring plan. The Permittee to date has not submitted the necessary paperwork to finalize the amendment and subsequently, the locations are still being sampled under the original water monitoring plan. The Division has notified the Permittee regarding the outstanding amendment and the Permittee has indicated that they intend to finalize the amendment in order to implement the new water monitoring plan prepared by JBR by the end of 2008. Presumably, the new water monitoring plan will go into effect as of first quarter 2009.

7. **Follow-up from last quarter, if necessary.**  
None

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