



State of Utah  
DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF OIL, GAS AND MINING

cc: Steve

OK

Michael O. Leavitt  
Governor  
Kathleen Clarke  
Executive Director  
Lowell P. Braxton  
Division Director

1594 West North Temple, Suite 1210  
PO Box 145801  
Salt Lake City, Utah 84114-5801  
801-538-5340  
801-359-3940 (Fax)  
801-538-7223 (TDD)

July 30, 2001

TO: Internal File  
THRU: Daron R. Haddock, Permit Supervisor *DRH*  
FROM: James D. Smith, Senior Reclamation Specialist *JD*  
RE: 2000 Fourth Quarter Water Monitoring, Andalex Resources, Inc., Wildcat Loadout, C/007/033-WQ00-4

1. Were data submitted for all of the MRP required sites? YES [X] NO [ ]  
*Identify sites not monitored and reason why, if known:*

2. On what date does the MRP require a five-year resampling of baseline water data.  
*See Technical Directive 004 for baseline resampling requirements. Consider the five-year baseline resubmittal when responding to question one above. Indicate if the MRP does not have such a requirement.*

**Resampling Due Date**

In the year preceding renewal, one sample at low flow and one at high flow for baseline analyses. Renewal submittal due 01/05/04, renewal due 05/05/04.

3. Were all required parameters reported for each site? YES [ ] NO [X]  
*Comments, including identity of monitoring site:*

WCW-1 and WCW-2: Total Iron was not reported. The monitoring plan does not include Total Iron, a parameter required by the Coal Mining Rules.

WCW-1 and WCW-2: Field pH and Field Specific Conductivity were not reported.

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

*Comments, including identity of monitoring site:*

Cation-anion Balance was high in both samples: in the previous quarter, the lab attributed this to analyses for total rather than dissolved metals and ions.

There have been only two previous samples from WCW-1 and WCW-2 and one from WCW-4 reported in the database, so there is no statistical basis for comparison.

5. Were DMR forms submitted for all required sites?

1<sup>st</sup> month, YES [X] NO [ ]  
2<sup>nd</sup> month, YES [X] NO [ ]  
3<sup>rd</sup> month, YES [X] NO [ ]

*Identify sites and months not monitored:*

6. Were all required DMR parameters reported? YES [X] NO [ ]

*Comments, including identity of monitoring site:*

There was no UPDES discharge all three months.

7. Were irregularities found in the DMR data? YES [ ] NO [X]

*Comments, including identity of monitoring site:*

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

Total Iron, a parameter required by the Coal Mining Rules, needs to be added to Table IV-10 (Water Quality Parameter List) in the Wildcat MRP.

Analyses should be done for both Total and Dissolved Iron and Total and Dissolved Manganese.

Table IV-10 isn't clear that, except for Total Iron and Total Manganese, analyses for metals and ions should be for dissolved rather than total concentrations: the operator needs to instruct the lab more carefully on analysis methods.