

WATER QUALITY MEMORANDUM

April 13, 2007

TO: Internal File

THRU: D. Wayne Hedberg, Permit Supervisor *DWH*

FROM: James D. Smith, Environmental Scientist *JS 10/05/07*

RE: 2006 Fourth Quarter Water Monitoring, Andalex Resources, Inc., Wildcat Loadout, C/007/0033

The Wildcat Loadout has no coal extraction operations. The monitoring plan is described in the MRP on pages 5-50 through 5-55, which includes Tables V-10 and V-11. Reports for this site typically indicate no observed flow at the monitoring points, including the UPDES discharge points. During the fourth quarter of 2006, flow was reported at stream monitoring point WCW-1 and water samples were analyzed for the operational parameters listed in Table V-10.

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

There is no spring, well, or in-mine monitoring at this site.

Streams YES NO

During the fourth quarter of 2006, flow was reported at stream monitoring point WCW-1.

UPDES YES NO

There was no flow or discharge at UPDES monitoring points WCW-A, WCW-B, WCW-C, WCW-D, WCW-E, and WCW-F during the fourth quarter of 2006.

2. Were all required parameters reported for each site?

Streams YES NO

UPDES YES NO

“No flow” or “no discharge” was reported for all UPDES discharge during the fourth quarter of 2006.

3. Were any irregularities found in the data?

Streams YES NO

Because there is rarely flow at this location, the 30-gpm flow reported on October 17, 2006 exceeds the mean by almost 10 standard deviations.

UPDES YES NO

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

In the year preceding renewal, one sample at low flow and one at high flow for baseline analyses. The next renewal submittal is due 01/05/09 and the next renewal is due 05/05/09, so five-year resampling should be done in 2008, if possible. During the last resampling period in 2003, only one sample was collected, at WCW-1 in March, and it was not analyzed for baseline parameters; there were no samples collected in 2002 or 2004 because of the dryness of this site.

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

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

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

None.

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

None.