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WATER QUALITY MEMORANDUM

Utah Coal Regulatory Program

March 21, 2008

TO: Internal File

FROM: James D. Smith, Environmental Scientist, Assistant Permit Supervisor *JS 03/25/08*

RE: 2007 Fourth Quarter Water Monitoring, Andalex Resources, Inc., Wildcat Loadout, C/007/0033, Task ID # 2694

The Wildcat Loadout has no coal extraction operations. The monitoring plan is described on page 137 and in Tables IV-10 and IV-11 of the MRP. Reports for this site indicate observed flow at only one monitoring point, UPDES discharge point WCW-E 005, during the third quarter of 2007.

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

There was no flow at MRP surface-water monitoring points WCW-1, WCW-2, WCW-3, and WCW-4 during the fourth quarter of 2007.

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 2007.

2. Were all required parameters reported for each site?

Streams YES NO

"No flow" was reported for all MRP monitoring points during the fourth quarter of 2007.

UPDES YES NO

"No flow" or "no discharge" was reported for all UPDES discharge during the fourth

quarter of 2007.

3. Were any irregularities found in the data?

Streams YES NO

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.

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?

Because of the sparsity of flow events at this loadout, the monitoring plan should be clarified so that any flow during the year preceding permit renewal will be analyzed for baseline parameters.