WATER QUALITY MEMORANDUM

Utah Coal Regulatory Program

September 22, 2008

TO: Internal File

FROM: James D. Smith, Environmental Scientist, Permit Supervisor JS 09/24/08

RE: 2008 Second Quarter Water Monitoring, Andalex Resources, Inc., Wildcat Loadout, C/007/0033, Ongoing 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 there was no flow at any monitoring points during the second quarter of 2008.

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 second quarter of 2008.

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 second quarter of 2008.

2. Were all required parameters reported for each site?

Streams YES ☒ NO ☐

"No flow" was reported for all MRP monitoring points during the second quarter of 2008.

UPDES YES ☒ NO ☐

"No flow" was reported for all UPDES discharge points during the second quarter of 2008.

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.