WATER QUALITY MEMORANDUM
Utah Coal Regulatory Program

January 21, 2009

TO: Internal File

THRU: Daron Haddock, Permit Supervisor

FROM: James D. Smith, Environmental Scientist III 01/21/09

RE: 2008 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 in the MRP on page 137 and in Tables IV-10 and IV-11. Quarterly reports submitted by the Permittee indicate that observed flow has been rare: most recent - March 2003 at WCW-1 and July 2007 at UPDES discharge point WCW-E 005.

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 2008.

UPDES YES ☒ NO ☐

There was no flow or discharge at UPDES monitoring points WCW-A 001, WCW-B 002, WCW-C 003, WCW-D 004, WCW-E 005, and WCW-F 006 during the fourth 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 fourth quarter of 2008.

UPDES YES ☒ NO ☐

"No flow" or "no discharge" was reported for all UPDES discharge points during the fourth 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 would have been done in 2008, but there was no reported flow at any monitoring site during 2008.

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.