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WATER QUALITY MEMORANDUM
Utah Coal Regulatory Program

March 1, 2012

TO: Internal File

THRU: Steve Christensen, Permit Supervisor SKC

FROM: Amanda Daniels, Environmental Scientist II AD

RE: 2011 Third Quarter Water Monitoring, Andalex Resources, Inc., Wildcat Loadout, C/007/0033 WQ11-3, Task ID #3923

The Wildcat Loadout processes coal but 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 measurable flow is very rare: most recent – October 17, 2006 at WCW-1 and 2,900 gpm on August 20, 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 Third Quarter of 2011.

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 Third Quarter of 2011.

2. Were all required parameters reported for each site?

Streams YES ☒ NO ☐

"No flow" was reported for all MRP stream monitoring points during the Third Quarter of 2011.

UPDES YES ☒ NO ☐

"No flow" was reported for all UPDES discharge points during the Third Quarter of 2011.

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, the MRP calls for one sample at low flow and one at high flow for baseline analyses. The permit was renewed 05/05/09: there were no reported flows or discharges during the year preceding renewal. The next renewal submittal is due 01/05/14 and the next renewal is due 05/05/14. Because of the scarcity 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.

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