

WATER QUALITY MEMORANDUM

Utah Coal Regulatory Program

December 17, 2009

TO: Internal File

THRU: James D. Smith, Permit Supervisor *DS 12/21/09*

FROM: April A. Abate, Environmental Scientist II *aaa 12-17-2009*

RE: 2009 Second Quarter Water Monitoring, Plateau Mining Corporation (PMC), Willow Creek Mine, C/007/0038-WQ09-02 Task ID #3325

The Willow Creek Mine is in reclamation. The mines have been closed and sealed. The disturbed areas around the portals have been regraded and seeded. The most recent surface operations took place in Willow Creek Canyon, about a mile from the junction between U.S. Highway 6 and State Highway 191. The reclaimed area in Crandall Canyon is also part of the Willow Creek permit area.

There are no ground water sites monitored during the reclamation phase.

1. Was data submitted for all of the MRP required sites? YES NO

Under the reclamation plan, surface water monitoring is required for sites listed in Exhibit 7-3 and shown on Map 15.

Springs- There are no springs monitored during the reclamation phase.

Streams- There are six surface water-monitoring sites:
 B3N (Willow Creek above power plant),
 B-5 (Price River below processing plant above Willow Creek),
 B-6 (Price River above coal processing plant),
 B25 (Crandall Canyon Creek),
 B26 (lower reach of Crandall Canyon)
 B151 (Willow Creek – 3 miles above Willow Creek Mine)

The reclamation sampling water quality list is presented in Section 13, p. 28. Sampling is conducted quarterly. PMC tries to monitor the sites within a two week period from March 15th, June 10th, September 5th and November 30th to attempt to collect data that coincides with first thaw, spring high flow, end of summer low-flow

WATER QUALITY MEMO

and last sample before freeze-up.

All required stream sampling locations were monitored for the quarter on June 25 and 29, 2009. No flow was reported from the Crandall Canyon sampling points (B25 and B26).

Wells- There are no operational monitoring wells.

UPDES- The mine has been reclaimed and as a result, there are no currently active Utah Pollutant Discharge Elimination System (UPDES) monitoring locations at the site.

2. **Were all required parameters reported for each site?** YES NO

3. **Were any irregularities found in the data?** YES NO

The surface water sample taken from Willow Creek (B3N) located above the power plant displayed elevated levels of total suspended solids (TSS) at a concentration of 147 parts per million (ppm) and total iron at a concentration of 3.23 ppm. Another sample B151 located further upstream also exhibited elevated levels of TSS at a concentration of 167 ppm and total iron at 3.92 ppm. While neither of these compounds have an established surface water standard, previous UPDES permit standards for these compounds were established at 70 and 1.0 ppm, respectively. Since UPDES points no longer exist at this site, these standards can only be applied as general guidelines. Furthermore, both of these samples are located upstream and represent background conditions.

Total Dissolved Solids (TDS) is a recognized pollutant for the Price River Watershed. TDS standards for this section of the Price River Watershed are set at 1,700 mg/L based on the Utah Administrative Code Rule R317-2. Stream samples collected continue to remain well below this standard.

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

Baseline data were collected at the beginning of mining operations for a two-year period; however routine 5-year sampling is not specified in MRP. The Division recommends baseline water quality parameter sampling at each five-year renewal period.

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

None.