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Outgoing
C/007/0038
BK

From: April Abate
To: dware@foundationcoal.com
CC: Jim Smith; OGMCOAL@utah.gov
Date: 1/7/2009 9:34 AM
Subject: 2008 Third Quarter Water Quality Report - Willow Creek Mine
Place: OGMCOAL@utah.gov
Attachments: 0019.pdf; April Abate.vcf

Hello Dennis,

I am attaching the 3rd Quarter 2008 Water Monitoring Report for Willow Creek Mine. It looks like you've been monitoring UPDES point 001, but you are no longer required to do so. Also, have you been able to get your water quality meter fixed?

I hope you enjoyed your holidays. Talk to you soon.

Regards,

April

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WATER QUALITY MEMORANDUM

Utah Coal Regulatory Program

December 29, 2008

TO: Internal File

THRU: James D. Smith, Permit Supervisor DS 12/31/08

FROM: April A. Abate, Environmental Scientist II AAA 12-30-08

RE: 2008 Third Quarter Water Monitoring, Plateau Mining Corporation (PMC), Willow Creek Mine, C/007/0038-WQ08-3, Task ID #2623

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 and last sample before freeze-up.

All required stream sampling locations were monitored for the quarter on September 24-25, 2008. No flow was reported from the Crandall Canyon sampling points (B25 and B26).

Wells- There are no operational monitoring wells.

UPDES- On August 5, 2008 the Department of Water Quality approved a request by the Permittee to deactivate the two UPDES points at the site: Site 001 is the sedimentation pond to Willow Creek Canyon and Site 002 is the temporary discharge in Crandall Canyon. Site 001 is now part of the Eastern Utah Western Energy Training Center and will likely never discharge. Site 002 was a discharge from the Crandall Canyon portal, which is now reclaimed and no longer exists. All other applicable provisions outlined in the UPDES permit apply until such time that final bond release is achieved.

The Permittee did submit monitoring data for UPDES location 001 indicating that there was no flow measured from that location.

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

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

Dissolved oxygen values for the stream samples were outside of two standard deviations for that parameter. DO concentrations were measured by the laboratory. Dissolved oxygen measurements should be collected in the field in order to achieve measurements of DO that are most representative of conditions in the stream. The fact that the results were outside of two standard deviations for dissolved oxygen in the samples calls into question the integrity of the lab data.

Conductivity values were outside of two standard deviations for that parameter in two of the stream samples. Conductivity was also measured by the laboratory, as opposed to being collected in the field.

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

Not specified in MRP. It should be updated at Mid-term or Five Year Renewal.

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

Upon last correspondence to the Division regarding water monitoring issues, the Permittee indicated that he was in the process of getting his DO and conductivity meter repaired in order to collect field measurements beginning with the first quarter of 2009.

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