

WATER QUALITY MEMORANDUM

Utah Coal Regulatory Program

May 5, 2005

TO: Internal File

THRU: D. Wayne Hedberg, Permit Supervisor

FROM: David Darby, Senior Reclamation Specialist III

RE: 2004, 4th Quarter Water Monitoring, Canyon Fuel Company, LLC, Dugout Mine, C/007/0039-WQ04-4, Task ID #2188

1. Was data submitted for all of required sites?

The Dugout Canyon Mine is conducting operations in Dugout Canyon. Plans have been submitted to DOGM to construct a fan portal in Pace Canyon. This report is based on data compiled in file; O:\0070039.dug\Water Quality\datacheck2004format.xls.

Table 7-4 identifies the ground water monitoring (frequency) plan for wells and springs. Table 7-4 also identifies the parameters that will be monitored. Appendix 7-6 of the MRP identifies the UPDES sites, and current status monitoring parameters, discharge limits and monitoring frequency. Table 7-5 identifies the surface water program and water quality parameters that will be monitored.

The Protocols set forth in Table 7-4 and 7-5 will be followed during years of normal precipitation as defined in the PHC. During non-normal (wet, 110% of normal or dry, 70% of normal) years, defined by the NRCS snow pack, March 1, selected surface and groundwater sites will be monitored weekly from April 1 through August 31.

Springs Springs in the operational and post-mining groundwater monitoring program include SC-65, SP-20, SC-14, SC-100, SC-116, 200, 203, 227, 259 260, and MD-1 (Gilson Seam).

YES NO All springs were monitored according to the schedule and data submitted.

Streams Surface Water sites DC-1, DC-2, DC-3, DC-4, DC-5, PC-1a, PC-2, RC-1 and Fan (a new site on Pace Creek) are monitored for flow and chemistry once each calendar quarter, except during wet or dry years.

YES NO Data were reported for all monitoring sites.

Wells Wells GW-10-2, GW-11-2 and GW 24-1 will be monitored quarterly for water levels, no water quality samples will be taken.

YES NO Water levels were measured in all wells.

UPDES UPDES permits have been issued for disturbed area and mine water discharges into Dugout (UTG 040020) and Pace Canyon (0025593) Creeks by the Utah Division of Water Quality, as indicated in Appendix 7-6. The permits identify the maximum discharge levels for specified constituents, allowed for the creeks. Mine water is currently pumped directly into the Dugout Creek. Disturbed runoff is directed to the sedimentation pond that can discharge to the Dugout Creek. Mine water will be pumped to Pace Creek out the Fan Portal. Disturbed area runoff from Pace Canyon will be directed to a catch pond, as it overflows it will flow to Pace Creek.

YES NO .

2. Were all required parameters reported for each site?

Springs YES NO Springs 200, 203, 260, SC-100, SC-14, SC-65 and SP0-20 were reported as no access. Dates describing the attempts to access the sites should be submitted. Spring SC-116 had no value for flow, but showed values water quality.

Streams YES NO The Permittee appears to not be monitoring Dissolved and Total Manganese.

Wells YES NO Dates describing the attempts to access the sites were submitted.

UPDES YES NO Site 001 was monitored four times during December. Only one sample taken on December 12, 2005 showed a discharge and pH measurement. The information is sufficient for the Division's needs.

3. Were irregularities found in the data?

Springs YES NO .

Streams YES NO As mentioned in Section 2 of this report.

Wells YES [] NO [X]

UPDES YES [] NO [X]

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

Resampling due date Does not specify.

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

The Permittee needs to supply data showing the values of dissolved and total manganese for samples as specified in Table 7-5 of the MRP. A copy of the data file will be e-mailed to the Mine Operator and DOGM Mine Inspector identifying any missing and irregular data. If the data is available, the Mine Operator should submit it to the DOGM Inspector and Hydrologist, so it can be entered into the Coal Database. If the data is not available the Operator may be in violation of R645-301-731-200. The operator should check to see if they have the dissolved and total manganese values for streams, and submitted it to the Division within 15 days.

Does the Mine Operator need to submit more information to fulfill this quarter's monitoring requirements? [X] Yes [] No

A copy of the data file will be e-mailed to the Mine Operator and DOGM Mine Inspector identifying any missing and irregular data.

Yes, see Section 5 of this report.

6. Follow-up from last quarter, if necessary.

Did the Mine Operator submit all the missing and/or irregular data (datum)?

This report and the previous report were delayed. The missing and irregular data will be tracked to ensure and the database is updated.