

WATER QUALITY MEMORANDUM

Utah Coal Regulatory Program

September 27th, 2017

TO: Internal File

THRU: Daron Haddock, Permit Supervisor

FROM: Steve Christensen, Environmental Scientist 

RE: 1st Quarter 2017 Water Monitoring, West Ridge Resources, West Ridge Mine, Task ID #5485

The West Ridge Mine is currently operational in the Book Cliff Mountain range of Carbon County, UT. Water monitoring data is submitted quarterly to the Division EDI database. Beginning on page 7-36 of the approved Mining and Reclamation Plan (MRP), water monitoring protocols and sampling requirements are provided for surface water, ground water, monitoring wells and UPDES outfalls in Tables 7-1, 7-2, 7-3 and 7-4 respectively.

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

Springs

The approved MRP outlines the monitoring of 8 springs (SP-8, SP-12, SP-13, SP-101, SP-0102, Road Spring, Section 5 Spring and SP-80). Two of the monitored springs (SP-12 and SP-13) discharge from the lower slopes of West Ridge in Whitmore Canyon. Spring SP-8 discharges in the upper drainage of C Canyon. Hanging Rock Spring (S-80) is located near the northwest corner of the permit area and discharges from the east slopes of Whitmore Canyon.

None of the springs could be accessed due to the excessive snowfall in the area.

Streams

The approved MRP outlines the monitoring of nine stream sites (ST-3, ST-6, ST-8, ST-15, Patterfore, LF-1, LF-2, RF-1 and RF-2).

Grassy Trail Creek is the only intermittent/perennial stream in the permit and adjacent areas. The upper drainages of Grassy Trail Creek (i.e. the Left and Right Fork) are monitored quarterly. Four monitoring sites have been established on the Left Fork (LF-1, LF-2, ST-3 and ST-15). Monitoring sites LF-1 and LF-2 are flume sites where continuous monitoring data is obtained during mid- to high-flow periods. During the late summer months, the flows of the Left and Right Forks of Whitmore Canyon decrease to a volume that cannot be measured accurately by the flumes. Site ST-15 monitors flow from the Spring Canyon drainage (tributary to the Left Fork).

Three monitoring sites have been established on the Right Fork (RF-1, RF-2 and Patterfore Stream). RF-1 and RF-2 are flume sites where continuous monitoring data is obtained during mid- to high-flow periods. The Patterfore Stream is a tributary to the Right Fork and was established as a monitoring site in the spring of 2011 in order to obtain additional data on the Right Fork drainage.

Continuous flow readings on the Left and Right Forks of Whitmore Canyon (LF-1, LF-2, RF-1 and RF-2) are typically not possible to obtain during the 1st and 4th quarters of the year due to flow volumes below the accuracy of the flumes and/or due to the inability to access the site due to snow conditions. Flows are typically obtained during the high-flow (late spring/early summer months i.e. 2nd quarter) and during the summer (3rd quarter) when flows are of sufficient volume to produce an accurate measurement (given the limitations of the flume).

Only one of the stream monitoring sites (ST-6) could be accessed this quarter due to the excessive snowfall in the area.

Wells

Quarterly operational sampling is required for one groundwater-monitoring well (Site DH 86-2). Monitoring well DH 86-2 could not be accessed this quarter due to the excessive snowfall in the area.

Underground Mine-Water Sample (UG-1)

The underground mine-water sampling point was not accessible during March the 1st quarter of 2016. Zero flow was reported for 2nd, 3rd, 4th quarter of 2016 as well as 1st quarter 2017. As mining has ceased, the pumps and water treatment are no longer operational.

UPDES

Operational sampling is required monthly for two active UPDES sites (Permit # UT0025640). Site D001 is the mine sites primary sediment pond discharge to the ephemeral 'C' Canyon drainage. Site D002 is the mine-water discharge to the ephemeral 'C' Canyon drainage.

Specific limitations and self-monitoring requirements as outlined in the UPDES permit are presented in the table below:

Effluent Characteristics	Effluent Limitations
Flow, MGD (million gallons per day)	1.0
Total Suspended Solids (TSS), ppm	70
Total Iron, ppm	1.0
Oil & Grease, ppm	10
Total Dissolved Solids (TDS), ppm	2,000
pH	9

None of the outfalls reported a discharge this quarter. As mining has ceased at the mine, the Permittee is no longer pumping water from the mine.

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

The previous quarter, issues associated with the Division's database and the laboratory conducting the analyses, data from several spring and stream monitoring points could not be uploaded to the water quality database. The Permittee provided the laboratory analytical reports for the aforementioned spring monitoring sites thus providing evidence that the required sampling was conducted and the required parameters sampled for. The data has since been uploaded into the database.

For the sites that were accessible 1st quarter 2017, all required parameters were reported.

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

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

On page 7-36 of the approved MRP, the Permittee commits to collecting baseline samples "from each spring in the monitoring program during the low flow (fall) sampling and from each stream monitoring sites during low flow every five years beginning with the first mid-term review."

Baseline sampling of ground and surface water sites will be required during the 3rd quarter of 2021.

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

NA

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. YES NO