

0013

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A Subsidiary of PacifiCorp

April 21, 1998

Mr. Steve McNeal
State of Utah
Department of Environmental Quality
Division of Water Quality - Permits and Compliance Section
288 North 1460 West
Salt Lake City, UT 84114-4870

2
ACT. 1015/009

RE: **Requested Material to Address the Deficiencies of the PacifiCorp-Trail Mountain Mine
UPDES Permit No. UT-0023728**

Dear Mr. McNeal:

Enclosed is the material requested by the Division of Water Quality to fulfill the deficiencies of UPDES Permit #UT-0023728. This packet includes:

1. Latitude and Longitude of outfall 002.
2. Discharge data for metals, cyanide and phenol collected within the last year, especially copper, lead, selenium, and zinc.
3. Information as required by the Colorado River Basin Salinity Control Forum Intercepted Groundwater Policy.
4. Signature of Responsible Corporate Official.
5. Summary of available recent receiving stream flow and water quality.

Item 5 is included with the information required by the Colorado River Basin Salinity Control Forum and is found in Appendix B.

Your consideration and approval of this permit renewal as well as the TDS conversion from a tonnage basis to a concentration limitation will be greatly appreciated. If you have any questions during your review of this packet, please feel free to contact Chuck Semborski at 435-687-4720 or Dennis Oakley at 435-687-4825.

Sincerely,

Roger C. Fry
Exploration Administrator

cc: Blake Webster (IMC)
Chuck Semborski (EWMC)
Dennis Oakley (EWMC)
File

This section includes:

- ◆ Latitude and Longitude of Outfall 002.
- ◆ Discharge data for metals, cyanide and phenol collected within the last year, especially copper, lead, selenium and zinc.
- ◆ Signature of responsible corporate official.

CONTINUED FROM PAGE 2

V. INTAKE AND EFFLUENT CHARACTERISTICS

A, B, & C: See instructions before proceeding - Complete one set of tables for each outfall - Annotate the outfall number in the space provided.
NOTE: Tables V-A, V-B, and V-C are included on separate sheets numbered V-1 through V-9.

D. Use the space below to list any of the pollutants listed in Table 2c-3 of the instructions, which you know or have reason to believe is discharged or may be discharged from any outfall. For every pollutant you list, briefly describe the reasons you believe it to be present and report any analytical data in your possession.

1. POLLUTANT	2. SOURCE	1. POLLUTANT	2. SOURCE

VI. POTENTIAL DISCHARGES NOT COVERED BY ANALYSIS

Is any pollutant listed in Item V-C a substance or a component of a substance which you currently use or manufacture as an intermediate or final product or byproduct?

YES (list all such pollutants below)

NO (go to Item VI-E)

EPA I.D. NUMBER (copy from Item 1 of Form 1)	OUTFALL NUMBER
UT0023728	002

Form Approved.
OMB No. 2040-0086
Approval expires 7-31-88

CONTINUED FROM PAGE 3 OF FORM 2-C

PART C - If you are a primary industry and this outfall contains process wastewater, refer to Table 2c-2 in the instructions to determine which of the GC/MS fractions you must test for. Mark "X" in column 2-a for all such GC/MS fractions that apply to your industry and for ALL toxic metals, cyanides, and total phenols. If you are not required to mark column 2-a (secondary industries, nonprocess wastewater outfalls, and nonrequired GC/MS fractions), mark "X" in column 2-b for each pollutant you know or have reason to believe is present. Mark "X" in column 2-c for each pollutant you believe is absent. If you mark column 2a for any pollutant, you must provide the results of at least one analysis for that pollutant. If you mark column 2b for any pollutant, you must provide the results of at least one analysis for that pollutant if you know or have reason to believe it will be discharged in concentrations of 10 ppb or greater. If you mark column 2b for acrolein, acrylonitrile, 2,4 dinitrophenol, or 2-methyl-4, 6 dinitrophenol, you must provide the results of at least one analysis for each of these pollutants which you know or have reason to believe that you discharge in concentrations of 100 ppb or greater. Otherwise, for pollutants for which you mark column 2b, you must either submit at least one analysis or briefly describe the reasons the pollutant is expected to be discharged. Note that there are 7 pages to this part; please review each carefully. Complete one table (all 7 pages) for each outfall. See instructions for additional details and requirements.

POLLUTANT AND CAS NUMBER (if available)	2. MARK 'X'			3. EFFLUENT				4. UNITS		5. INTAKE (optional)					
	a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (if available)		c. LONG TERM AVG. VALUE (if available)		d. NO. OF ANALYSES	a. CONCENTRATION	b. MASS	e. LONG TERM AVERAGE VALUE		f. NO. OF ANALYSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
METALS, CYANIDE, AND TOTAL PHENOLS															
1M. Antimony, Total (7440-36-0)	X			ND						1	ug/L				
2M. Arsenic, Total (7440-38-2)	X			ND						1	ug/L				
3M. Beryllium, Total (7440-41-7)	X			ND						1	ug/L				
4M. Cadmium, Total (7440-43-9)	X			ND						1	ug/L				
5M. Chromium, Total (7440-47-3)	X			ND						1	ug/L				
6M. Copper, Total (7440-50-8)	X			ND						1	ug/L				
7M. Lead, Total (7439-92-1)	X			ND						1	ug/L				
8M. Mercury, Total (7439-97-6)	X			ND						1	ug/L				
9M. Nickel, Total (7440-02-0)	X			8.2						1	ug/L				
10M. Selenium, Total (7782-49-2)	X			1						1	ug/L				
11M. Silver, Total (7440-22-4)			X												
12M. Thallium, Total (7440-28-0)	X			ND											
13M. Zinc, Total (7440-66-6)			X												
14M. Cyanide, Total (57-12-5)	X			ND						1	ug/L				
15M. Phenols, Total			X												
DIOXIN															
2,3,7,8 Tetra chlorodibenzo P Dioxin (1764 01 6)					DESCRIBE RESULTS										

CONTINUE ON REVERSE

This section includes:

- ◆ Information as required by the Colorado River Basin Salinity Control Form Intercepted Groundwater Policy.
- ◆ Summary of available recent receiving stream flow and water quality (Appendix B of above report).

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1.0 Introduction

PacifiCorp has operated the Trail Mountain mines since 1992. The mine is located in the central Wasatch Plateau west of Huntington, Utah. PacifiCorp is currently planning to expand the Trail Mountain mine north and west to include the Trail Mountain Lease-By-Application (Trail Mountain LBA; Figure 1).

The scope of this report describes the topography, geology and hydrology of the Trail Mountain area within and around the mine. All aspects of these topics are completely reviewed as required by the *Intercepted Groundwater Policy for Implementation of the Colorado River Salinity Standards*. The information has been gathered from documents previously compiled for the Trail Mountain and East Mountain areas.

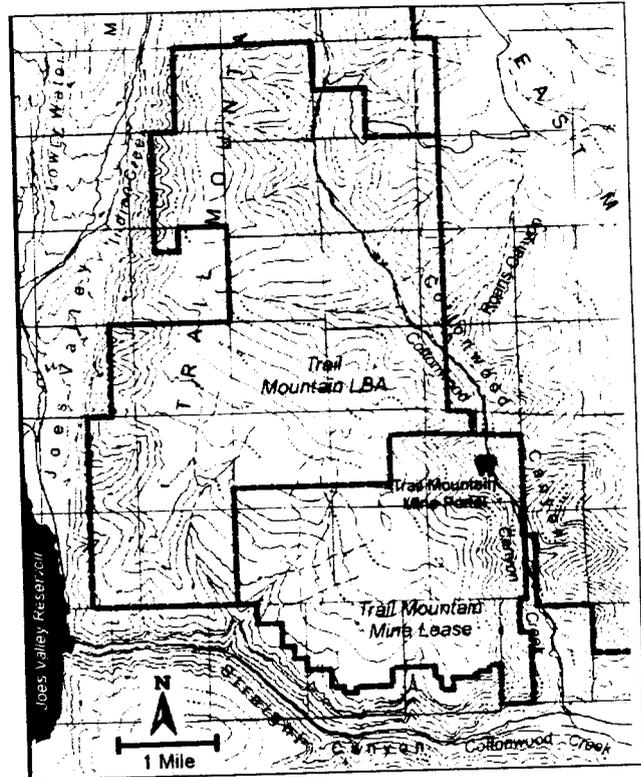


Figure 1: Map of the current and proposed Trail Mountain area and principle geographic features.

2.0 Topography

The topography of the PacifiCorp mines, including the Trail Mountain Mine, consists of narrow, flat-topped mesas surrounded by heavily vegetated slopes that extend to the precipitous cliffs of the eastern escarpment of the plateau. At the base of the plateau lies Castle Valley, which is developed on the Mancos Shale, and is naturally nearly devoid of vegetation. The Trail Mountain is separated from the surrounding area by the Joe's Valley to the west, Straight Canyon to the south, and Cottonwood Canyon to the east. Ground elevations range from approximately 6,800 feet near the base of the plateau in Castle Valley to over 10,600 feet immediately north of Trail Mountain (Mayo, 1997).

3.0 Geology

The Wasatch Plateau coal field was formed along the western shoreline of the Cretaceous Seaway. Sediments deposited in the sea and coastal areas were derived mainly from western Utah. The Cretaceous Seaway oscillated due to tectonic events forming marine and non-marine sequences characteristic of fluvial, wave dominated deltas, and strand-plain deposits. The Trail Mountain area is bounded by the eastern erosional escarpment of the Wasatch Plateau and on the west by the Joes Valley Fault System. The dip of the bedrock is controlled primarily by the Straight Canyon Syncline, which runs diagonally through the middle of the lease area, trending approximately north 50° east and plunging to the southwest (Figure 2). Bedrock located northwest of the syncline axis generally dips toward the southeast, whereas bedrock located southeast of the syncline axis dips toward the northwest. The dips of the rocks throughout the area are gentle, rarely exceeding 6°.



Figure 2: Geologic fault map of the Energy West lease area.

Most faults in the area trend north-south or northeast-southwest (Figure 2). The most significant is the Joes Valley Fault System, which extends more than 20 miles to the north and 40 miles to the south of the Joes Valley Reservoir dam, and has reported 2,300 feet of vertical displacement (Davis and Doelling, 1977). Joes Valley is a graben formed on the downthrown block west of the fault; Trail Mountain forms the horst block east of the fault. Much of Joes Valley is filled with alluvium that is juxtaposed against the bedrock formations of Trail Mountain.

The Mill Fork and Roans Canyon Fault systems, which have much less displacement than the Joes Valley System, form narrow grabens in the central portion of Trail Mountain and in the northern

portion of East Mountain. The Mill Fork and Roans Canyon Fault systems roughly parallel the Straight Canyon Syncline (Figure 2) and appear to be scissor faults hinged near the center of Trail Mountain. At the hinge location there is essentially no vertical or horizontal displacement. Maximum displacement on these faults in the lease area is estimated to be 30 feet on the Mill Fork Fault, and 160 feet on the Roans Canyon Fault.

The Pleasant Valley fault System, which extends for 20 miles north of the lease area, is located along the eastern edge of East Mountain (Figure 2). In the lease area, displacement is less than 150 feet.

Near surface joints sets trending northeast-southwest, and northwest-southeast are common in the lease area. Lineament and drainage trace analysis suggest that the major trunk streams in the lease and adjacent area follow a regional northwest-southeast trend and that these drainages follow fracture or joint systems (Peters and Speirer, 1986).

Formations exposed in the Trail Mountain region range from Tertiary to Upper Cretaceous and are described below. In descending order, these formations are the: Flagstaff Limestone, North Horn, Price River Formation, Castlegate Sandstone, Blackhawk Formation, Star Point Sandstone, and Mancos Shale (Figure 3).

3.1 Description of Stratigraphy (Mayo, 1977)

3.1.1 Flagstaff Limestone (Tertiary Age)

The Flagstaff Limestone, which caps the uppermost portions of the Wasatch Plateau, is the youngest of the bedrock formations exposed in the Trail Mountain lease area (Figure 3). It typically forms a prominent white cliff on the top of the plateau. A thickness of 105 feet was measured on the Trail Mountain.

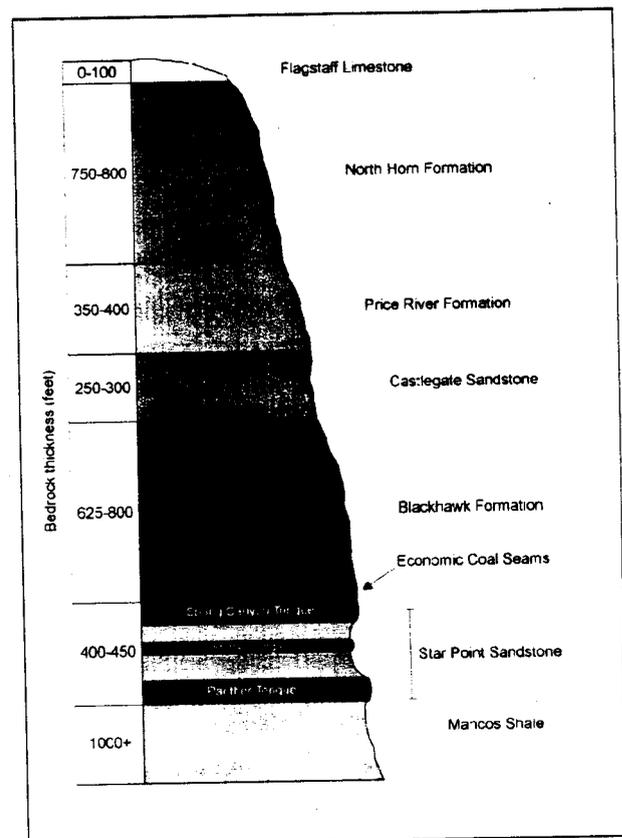


Figure 3: Stratigraphic column of bedrock formations in the mine lease area.

The Flagstaff Limestone consists of carbonates, marls and some thin sandstone stringers deposited in lacustrine, and alluvial plain depositional environments (Garner and Morris, 1996). It primarily consists of light- to medium-gray limestone containing abundant secondary fractures produced during uplift and sub-aerial exposure. Thin beds of shale and volcanic ash are present in some locations.

3.1.2 North Horn Formation (Tertiary-Cretaceous Age)

The North Horn Formation is the caprock of much of East and Trail Mountains where the Flagstaff Limestone has been eroded away. Exposures of the North Horn Formation form purple, red, or brown colored slopes. In the Trail Mountain area the thickness ranges from 750 to 800 feet and increases to the west.

The North Horn Formation was deposited in an alluvial-plain/suspended-load fluvial channel environment. In such environments, layers of mud are more abundant than sands, which occur in sandstone channels. The sandstone channels are generally isolated from each other both laterally and vertically by mud-rich overbank and interfluvial rocks (Galloway, 1977). In the area the formation consists primarily of shale with discontinuous sandstone channels, minor lenses of limestone, and conglomerate. Highly bentonitic mudstones, which swell when wetted, are common in the lower two-thirds of the formation.

3.1.3 Price River Formation (Cretaceous Age)

The Price River Formation typically forms a steep, receding slope above the Castlegate Sandstone with alternating ridges and slopes resulting from the interbedding of resistant sandstones with less resistant shales and claystones. In the lease area the formation is 350 to 400 feet thick.

The Price River Formation was deposited from mixed-laid fluvial channel systems having sandstone/mudstone ratios intermediate between bed-load and suspended-load channel systems. Sandstones and mudstones occur in about equal proportions. Point bars that develop in this type of system are larger than those in suspended-load channel systems. Mudstone drapes created during low flow stages of the active fluvial system separate the sandstones from each other both horizontally and vertically.

3.1.4 Castlegate Sandstone (Cretaceous Age)

The Castlegate Sandstone has a distinctive cliff forming habit and typically forms a resistant cliff above the underlying, less resistant Blackhawk Formation. The thickness of the Castle Gate Sandstone ranges from 250 to 300 feet in the lease area.

The formation was deposited from bed-load fluvial channel systems. The Castlegate Sandstone is made up of coarse-grained, often conglomeratic, fluvial sandstone with some thin interbeds of siltstone and claystone, especially toward the base of the unit. Sandstone dominates over mudstone and individual sand channels may be thin, wide, or interpenetrating. Although the primary porosity is high, the existence of mudstone drapes and pervasive carbonate and silica cement greatly reduces the overall porosity.

3.1.5 Blackhawk Formation (Cretaceous Age)

The Blackhawk Formation generally forms a steep, irregular slope between the cliffs of the underlying Star Point Sandstone and the overlying Castlegate Sandstone.

The formation consists of an upper non-marine, suspended-load fluvial portion and a lower marine shoreface and non-marine foreshore portion. Massive, cliff-forming units are common in the upper portion, and thinner-bedded, slope-forming units are common in the lower portion. The thickness of the Blackhawk Formation ranges from 625 to 800 feet and generally thickens to the northeast. Most of the thicker coal seams occur in the lower 150 feet of the Blackhawk Formation.

The upper portion of the Blackhawk Formation was deposited in an alluvial-plain/suspended-load fluvial channel environment. In these delta and flood-plain environments, layers of mud are more abundant than channel sands. Sandstone channels are generally isolated from each other both laterally and vertically by mud-rich overbank and interfluvial rocks (Galloway, 1977). The upper portion of the Blackhawk Formation also contains some thin carbonaceous shale layers and thin coal seams which are not of economic interest.

The lower portion of the Blackhawk formation contains the minable coal deposits and consists of more thinly bedded sandstone and shale layers (Johnson, 1978). The coal-bearing units of the lower Blackhawk Formation overlie and are laterally juxtaposed to marine shoreface sandstones of the Blackhawk Formation and Star Point Sandstone. On a large scale, these sandstone bodies are laterally continuous but terminate abruptly into the mud- and organic-rich backshore faces in a landward direction (Van Wagoner and others, 1990). However, individual rock layers are

lenticular and discontinuous with abundant shaley interbeds. The fine- to medium-grained sandstones occur as thin- to massively- bedded paleochannel deposits. The paleochannels increase in frequency, thickness, and lateral extent upward in the formation. There is also a vertical repetition of erosional scours within the upper sandstones (Marley and others, 1997).

The PacifiCorp mine workings are within the Hiawatha and Blind canyon coal seams. In most locations the Hiawatha seam lies directly on top of the Star Point Sandstone. In some locations, a 0-15 foot thick shaley lagoonal deposit is present between the Hiawatha seam and the top of the Star Point Sandstone. The Blind Canyon seam lies approximately 80 feet above the Hiawatha seam. In the Wasatch Plateau, large areas of the Blackhawk Formation have been baked by natural burning of the coal near the surface. These reddish clinker layers are generally more resistant and form steeper slopes than adjacent unburned layers.

3.1.6 Star Point Sandstone (Cretaceous)

The Star Point Sandstone, which is present throughout the area, forms massive cliffs where exposed at the surface. The sandstone was deposited as marine shoreface blanket sands which are laterally continuous, but thin seaward (east). Landward (west), these sandstones terminate abruptly into the mud- and organic-rich backshore facies. Because many of the organic-rich facies have been converted to minable quality coal, locally the Star Point Sandstone has immediate contact with coal seams. Elsewhere, sandstone bodies of the Star Point Sandstone are overlain and underlain by lower shoreface and open marine shales of the Mancos Formation. What this means is that the marine shoreface sandstones are three dimensionally encased by low-permeability marine shales and fine-grained carbonaceous backshore coal-bearing facies.

The Star Point Sandstone thins eastward and emerges with the underlying Masuk Member of the Mancos Shale. Three prominent tongues of the Star Point Sandstone interfinger with the Mancos Shale. These three sandstone members, from top to bottom, are the Spring Canyon, Storrs, and Panther Sandstones. In the lease area, the Spring Canyon tongue is approximately 100 feet thick, lies about 80 feet above the Storrs tongue, and consist of massive, fine- to medium-grained sandstone. The Storrs tongue lies about 120 feet above the Panther tongue and consists of 50 feet of soft, friable sandstone. The basal Panther tongue is approximately 100 feet thick and consists of massive, cross-bedded delta front sandstones.

3.1.7 Masuk Member of the Mancos Shale (Cretaceous Age)

The marine Masuk Member of the Mancos Shale was deposited in an open marine environment. The rock is highly erodible calcareous, gypsiferous, and carbonaceous dark gray shale. It is

continuously exposed along the eastern edge of the Wasatch Plateau. The Masuk Member is approximately 1,300 feet thick. Westward thinning wedges of the Masuk interfinger with tongues of the Star Point Sandstone. Castle Valley, to the east of the PacifiCorp mines is developed on the Mancos Shale.

4.0 Hydrology

The principal factor controlling the occurrence and availability of groundwater in any area is geology. Although some of the sandstones in the region serve as the principal water-bearing strata, their ability to yield water for extended periods of time is largely controlled by the existence of the relatively impermeable interbedded shale layers, which prevent the downward movement of a significant amount of water.

According to the US Geological Survey (1979), groundwater in the region exists under water table, artisan, and perched conditions. Water table conditions exist primarily in shallow alluvial deposits along larger perennial streams and in relatively flat lying sedimentary rocks. Artisan conditions exist at greater depths where a confining layer overlies a more permeable member; however, pressures are generally not sufficient to produce flowing wells. Perched or impeded conditions exist where the confining layer lies beneath the water-bearing stratum.

As noted by Lines (1985), the Blackhawk Formation and the Star Point Sandstone are considered together in the region as an aquifer. These formations are typically saturated where they exist sufficiently far from the edges of canyons; however, the Blackhawk Formation tends to be drained near the canyons, as is the case in the existing Trail Mountain Mine workings..

PacifiCorp has monitored significant groundwater inflows into each of its mines since 1979. Groundwater encountered within mine openings occurs by three main mechanisms. These mechanisms include: 1) drainage from overlying sandstone channels which are penetrated by roof-bolts and by vertical boring, or which are exposed during mining, 2) interception of water bearing faults and major fracture systems which transmit water from either overlying or underlying horizons, and 3) upward leakage from the underlying Spring Canyon Member of the Star Point Sandstone.

Generally water encountered within the mine has been in the form of roof leakers through bolt holes and tension cracks positioned parallel to the working face of the mine. As mining progresses and downdip, leakers further than 500 feet updip of the working face generally dry up. Only a limited amount of water is made within the mine. Water produced within the mine is used for dust suppression and fire protection within the mine and for the operation of in-mine machinery.

Occasionally mine water production will exceed usage because of inactivity of the mine operation, short lived surges of inflow, etc. As a result, a system has been constructed to allow for discharge of the mine water from a sump to Cottonwood Creek, with an option of routing the discharge through the sediment pond if necessary. This discharge point is approved under the current UPDES Discharge Permit and is fitted with a flow meter for accurate quantity measurement. Intercepted groundwater is monitored, quantified and reported annually in the Hydrologic Monitoring Report.

As has been noted, the occurrence and quality of groundwater in any region is highly controlled by geology. It is believed that the Straight Canyon Syncline may influence the groundwater hydrology in the northwester corner of the permit area. The axis of the syncline, plunging NE-SW at approximately 3.5°, passes just to the northwest of the current permit boundary and through the LBA. It is visible at the outcrop at the Joes Valley dam. The syncline is a prominent feature and could provide a conduit for groundwater migration from NE-SW. Increased amounts of intercepted groundwater can be expected as mining approaches the syncline axis. Rather than rapid inundation which can occur along fault zones, a gradual increase in the amount of groundwater entering the mine should be anticipated as mining proceeds downdip below the potentiometric surface toward the syncline axis.

5.0 Chemical Quality Intercepted Groundwater

Since the commencement of mining by PacifiCorp, hydrology data has been collected within and around the Trail Mountain Mine. This data includes in-mine, spring and surface water samples to determine the effects of mining on water quality. The following sections evaluate the water quality of these areas from the data collected from 1997. Historical data provide similar trends.

5.1 In-Mine

Water quality samples have been collected from seepages within the Trail Mountain Mine to determine the groundwater hydrologic conditions within the Blackhawk Formation and Star Point Sandstone in which the coal-bearing zone is located. The sample location map of Figure 4, shows the locations of all sampling points within the Trail Mountain mine. Stiff diagrams have been added to the figure to show the quality composition of the intercepted groundwater.

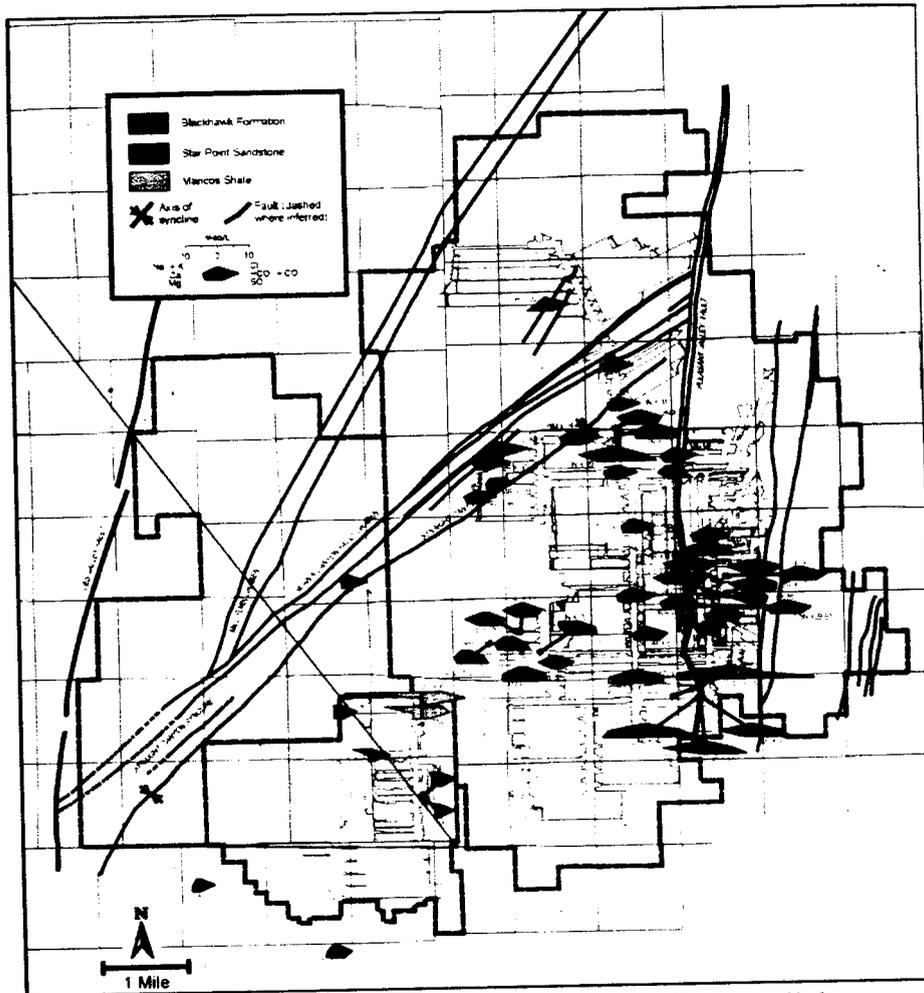


Figure 4: Stiff diagram of in-mine, monitoring well, and Oliphant Mine (T-18) waters.

The analysis of the chemical constituents intercepted within the Trail Mountain mine are identified in Table 2. The locations were listed because of their water producing capabilities. These samples tend to have consistent levels of TDS at each location within the mine; however, TDS concentrations from one location to the next are highly variable. TDS generally ranges from approximately 700 to 1600 mg/L, depending on the location from where sample is taken.

Table 1. Sampling of TDS at various locations within the Trail Mountain Mine.

Location	Date Sampled	TDS (mg/L)
9 th Right XC-75	July 18, 1997	890
"	July 21, 1997	880
"	July 22, 1997	890
9 th Right XC-70	July 18, 1997	1560
"	July 21, 1997	1570
"	July 22, 1997	1560
UG-3	March, 1997	320
"	June, 1997	300
"	September, 1997	300
"	December, 1997	310

The samples taken from the 9th Right locations are specific of the Star Point Sandstone. Table 1 shows how TDS differs from location to location. TDS at XC-75 is measured at 890 mg/L, while 500 feet to the east, TDS increased 680 mg/L to 1560 mg/L. Samples taken from UG-3 are specific to the Blackhawk Formation. These samples also show consistent TDS values measured throughout 1997.

Average TDS and loading of mine water discharge was calculated using DMR reporting data from 1997. Intercepted groundwater was discharged only in the latter half of the year from the Trail Mountain Mine. Discharge increased as mining progressed to the west, towards the Straight Canyon Syncline. The average TDS (Appendix A) of the samples taken were 954.50 mg/L. This gave a loading value of 1,529.06 lbs/day or 24.94 tons/month. Although the discharge is under the daily loading limit of one ton per day or 350 tons per year, it is anticipated that discharge will steadily increase and compliance will be increasingly difficult to

maintain. It is thus, recommended that the current UPDES (permit # UT-040003) be converted from a General to a Site Specific/Individual Permit to allow intercepted groundwater to be discharged based on the Total Dissolved Solids instead of the current tonnage limit. Table 2 below displays the salt loading that would occur at various flows.

Table 2: Loading calculation of lbs/day using flow vs. TDS.

		GPM									
		100	200	300	400	500	600	700	800	900	1000
T D S	500	602	1204	1806	2408	3010	3612	4213	4815	5417	6019
	1000	1204	2408	3612	4815	6019	7223	8427	9631	10835	12038
	1500	1806	3612	5417	7223	9029	10835	12640	14446	16252	18058
	2000	2408	4815	7223	9631	12038	14446	16854	19261	21669	24077

From the above Table, it is evident that when TDS remains constant, salt loading increases proportionally as flow increases. Even with a drinking water quality of 500 parts TDS, effluent limitations of 1 ton/day is surpassed when mine discharge exceeds 330 gal./min. The quality of the water discharged is not compromised, only the quantity is increased.

5.2 Surface Springs

The springs within and adjacent to the mine plan area exist under perched conditions because of the existence of relatively impermeable interbedded shales within the North Horn, Price River, Castlegate and Blackhawk Formations. Springs issue from a sandstone layer underlain by shale adjacent to and downslope from a local recharge basin where more than average snow can accumulate. Recharge zones for these local springs are nearby flats along ridges. Springs generally do not occur along narrow ridges with steep side slopes where little opportunity for groundwater recharge exists.

Another interesting groundwater characteristic deals with the origin of springs with regard to geologic formations. The springs sampled on Trail Mountain were associated with the North Horn Formation. As previously mentioned, the North Horn Formation consists of varied shale, sandstone, and thin-bedded limestone. The shale layers act as impeding members to deep percolation, diverting a significant portion of water which percolates through the soil mantle and forcing it to move somewhat horizontally to be discharged at the surface as spring water. Most of the springs are located at higher elevations. The North Horn Formation lacks distinct and

persistent lithologic units (Spieker, 1931); therefore, the sandstone of water-bearing lenses of the formation is somewhat discontinuous. This fact, coupled with the fact that recharge zones for the springs are in the nearby flats along the ridges, implies that springs are local in extent as opposed to a larger more regional system. In other words, water encountered from springs are from different origin than the water encountered underground.

5.3 Surface Streams

A portion of the Cottonwood Creek watershed receives drainage from the mine plan area. Stream channels from the mine plan area flow to the east toward the Cottonwood Canyon Creek and to the south toward Straight Canyon Creek, a tributary of Cottonwood Creek. Cottonwood Creek is a perennial stream. Figure 5 shows the drainage basins of the Trail Mountain and East Mountain areas.

The Cottonwood Canyon Creek is a major drainage system where evidence of glaciation exists. From the headwaters to Section 24, Township 17 South, Range 6 East, the canyon is characterized by U-shaped valleys with associated lateral and terminal moraine deposits. Lateral moraine deposits most commonly occur at the intersection with side canyons. Terminal moraine deposits occur at the northwest corner of Section 24 and from this point to near the confluence with Straight Canyon the canyon can be characterized as a V-shaped valley with little evidence of glaciation.

Based on data collected by PacifiCorp, Cottonwood Canyon Creek is an ephemeral stream from its headwaters to Section 24, Township 17 South, Range 6 East and intermittent from that point

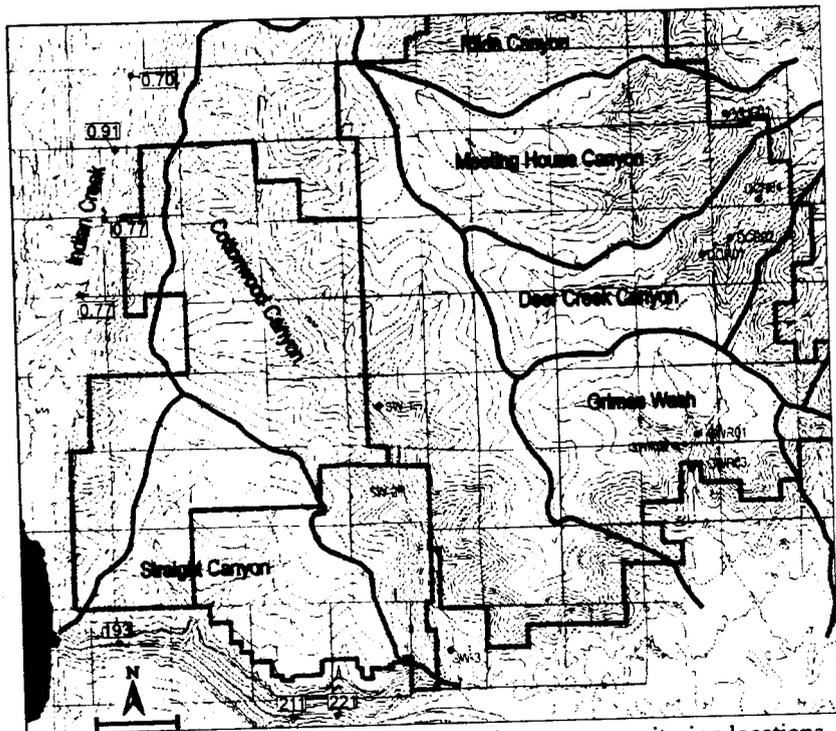


Figure 5: Map showing drainage basins, surface water monitoring locations.

to its confluence with Cottonwood Creek at Straight Canyon. The stream becomes intermittent near the intersection of Roans Canyon just below the terminal moraine deposits discussed above. During drought conditions which have been experienced since 1985, flow in Cottonwood Canyon is limited to flow emanating from the Roans Canyon Spring located in Section 24 near the confluence with Roans Canyon. In normal precipitation years with ample snowpack, runoff saturates alluvial deposits and discharges from the Cottonwood Spring. The Cottonwood Spring is (TM-23) located at a higher elevation than the Roans Canyon Spring.

Surface water-quality data collected from Cottonwood Canyon Creek by PacifiCorp indicate that the dominant ions are: calcium, magnesium, and bicarbonate. Total dissolved solids concentrations in the stream historically vary from about 300 to 1000 milligrams per liter in the mine area, with lower concentrations normally occurring during the high-flow season.

PacifiCorp established permanent sampling sites in the Cottonwood Canyon Creek in order to tract water quality of the creek. These sites are labeled SW-1, SW-2, and SW-3. SW-1 is located above the point of mine discharge. Site SW-2 is located at the Trail Mountain Mine immediately below the point of mine discharge. And site SW-3 is located farther down the creek above the confluence of the Cottonwood Creek. Refer to Figure 5 for the locations of these permanent sampling sites.

Quality data was collected from these sites in both 1996 (no mine discharge) and 1997 (mine discharge from May through December) and is found in Appendix B. Average TDS in 1996 for SW-1, SW-2, and SW-3, was 446.25 mg/L, 680.67 mg/L, and 852.25 mg/L respectively. When compared to data collected in 1997, we find that the TDS concentration actually dropped at the three sites to 350 mg/L, 650 mg/L, and 797.50 mg/L. The TDS of the mine discharge during this time period averaged 954.50 mg/L. This suggests that mine discharge had little effect to the TDS concentration of the creek. The influence of the geologic formations from SW-1 to SW-3 is believed to control the TDS concentration in the creek rather than the mine discharge.

A mass balance calculation was conducted on the Cottonwood Canyon Creek between the TDS contributions of the mine discharge and SW-1. This was conducted to further justify that mine discharge has minimal effects on salt loading of the creek. The calculation is found in Appendix B. Using the 1997 average, it was found that the TDS concentration immediately below the mine is 662.42 mg/L. This value correlates very well with 1996 values when there was no mine water discharged into the Cottonwood Canyon Creek.

6.0 Conclusion

Based on the sampling history of the Trail Mountain mine, the quality of the intercepted groundwater is fairly consistent, ranging in values from 300 mg/L to 1600 mg/L, depending on the location the sample was taken. Discharge from the mine into the Cottonwood Canyon Creek imitates these values, thus, suggesting that no additional salt is accumulated during transport from source to discharge point. Intercepted mine waters correspond very well to the TDS values achieved from the surface waters.

With the anticipation of intercepting increased quantities of groundwater as mine production extends further west, compliance with the UPDES (Permit #UT-040003-002) will/has become increasingly difficult if not impossible. Thus, it is essential that the current UPDES permit be converted from a General to Site Specific/Individual permit to allow intercepted groundwater to be discharged based on the concentration of the Total Dissolved Solids instead of the current tonnage limit.

This conversion was justified by examining the TDS concentration of the Cottonwood Canyon Creek during times when mine water was discharged and when not discharged. It was found that the mine discharge had little effect on the TDS concentration of the creek using the water quality parameters recorded in 1996 and 1997. Also, a mass balance was conducted using the data from the mine discharge and sampling site SW-1 as sources. It was concluded that the TDS concentration remained consistent with concentrations achieved when there was no mine discharge.

PacifiCorp, therefore, recommends that the TDS limitation be set to a level that is compatible with the TDS of the intercepted groundwater. This limitation should be set at 75% of the maximum, or 1200 mg/L. This adjustment in the TDS level will allow for discharge of water intercepted by mining without violating the UPDES permit.

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Appendices

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**Appendix A
Summary of Trail Mountain Mine Water Discharge Data
Water Quality Analysis Reports of UT-040003-002**

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Appendix B
Sample Location Data of the Cottonwood Canyon Creek for the Years
1996 and 1997
Mass Balance Calculations

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1996

*Energy West Mining Co.
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1997

*Energy West Mining Co.
P.O. Box 310
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**Appendix A
Summary of Trail Mountain Mine Water Discharge Data
Water Quality Analysis Reports of UT-040003-002**

*Energy West Mining Co.
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Appendix B
Sample Location Data of the Cottonwood Canyon Creek for the Years
1996 and 1997
Mass Balance Calculations

*Energy West Mining Co.
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1996

*Energy West Mining Co.
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1997

*Energy West Mining Co.
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**Appendix A
Summary of Trail Mountain Mine Water Discharge Data
Water Quality Analysis Reports of UT-040003-002**

Trail Mountain Mine Discharge Data 1997

Date	TDS (mg/L)	Flow (gpm)	Loading (lbs/day)	Tons/Month
Dec-97	940	161	1821.89	27.33
Nov-97	930	246	2754.15	41.31
Oct-97	1020	157	1927.83	28.92
Sep-97				
Aug-97	920	120	1329.04	19.94
Jul-97	940	120	1357.93	20.37
Jun-97	977	100	1176.15	17.64
May-97				
Apr-97				
Mar-97				
Feb-97				
Jan-97				
Average	954.50	150.67	1727.83	25.92

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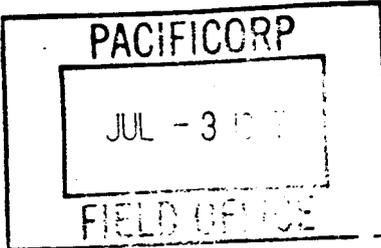


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FAX: (801) 653-2436

July 1, 1997

PACIFICORP FIELD OFFICE
P.O. Box 1005
Huntington UT 84528



Sample identification by
PACIFICORP FIELD OFFICE

Trail Mountain Mine Discharge
UPDES UG-040003-002

Rec'd 1130 hr.
Sampled 0900 hr.

Kind of sample reported to us Water

Sample taken at

Sample taken by Energy West/M.D.

Date sampled June 2, 1997

Date received June 2, 1997

FIELD MEASUREMENTS

pH 8.27
DO 8.0
Flow 100 gpm
Conductivity 1259
Temperature 16.0°C

NOTE: Dissolved metals filtered at lab!

Analysis report no. 59-17218

Parameter	Result	MRL	Units	Method	Analyzed	
					Date/Time	Analyst
Acidity	<10	10	mg/l as CaCO ₃	D1067-92	06-10-1997 0730	SW
Alkalinity, Bicarbonate	601	5	mg/l as HCO ₃	SM2320-B	06-04-1997 1000	RJ
Alkalinity, Carbonate	6	5	mg/l as CO ₃	SM2320-B	06-04-1997 1000	RJ
Alkalinity, Total	502	5	mg/l as CaCO ₃	EPA 310.1	06-04-1997 1000	RJ
Anions	15.4	----	meq/l	-----	06-26-1997 1800	RJ
Calcium, Dissolved	34	1	mg/l	EPA 215.1	06-19-1997 1115	MK
Cations	15.6	----	meq/l	-----	06-26-1997 1800	RJ
Chloride	31	1	mg/l	SM4500-Cl-B	06-26-1997 0810	RJ
Conductivity	1421	1	umhos/cm	SM2510-B	06-10-1997 1200	SW
Hardness, Total	175	----	mg/l as CaCO ₃	SM2340-B	06-26-1997 1800	RJ
Iron, Total	1.4	0.1	mg/l	EPA 236.1	06-19-1997 0900	MK
Iron, Dissolved	0.3	0.1	mg/l	EPA 236.1	06-19-1997 0900	MK
Magnesium, Dissolved	22	1	mg/l	EPA 242.1	06-19-1997 1130	MK
Manganese, Total	<0.1	0.1	mg/l	EPA 243.1	06-19-1997 0915	MK
Manganese, Dissolved	<0.1	0.1	mg/l	EPA 243.1	06-19-1997 0915	MK
Oil & Grease	<2	2	mg/l	SM5520-B	06-11-1997 0700	CC
pH	8.37	----	pH units	EPA 150.1	06-02-1997 1140	RJ
Potassium, Dissolved	5	1	mg/l	EPA 258.1	06-19-1997 0945	MK
Sodium, Dissolved	274	5	mg/l	EPA 273.1	06-19-1997 1030	MK
Solids, Settleable	<0.5	0.5	ml/l	EPA 160.5	06-02-1997 1230	CC
Solids, Total Dissolved	920	10	mg/l	EPA 160.1	06-05-1997 0700	CC
Solids, Total Suspended	73	5	mg/l	EPA 160.2	06-05-1997 0700	CC
Sulfate	217	83	mg/l	EPA 375.4	06-24-1997 0830	RJ
Cation/Anion Balance	0.4	----	%		06-26-1997 1800	RJ

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July 10, 1997

PACIFICORP FIELD OFFICE
P.O. Box 1005
Huntington UT 84528



Sample identification by
PACIFICORP FIELD OFFICE

TRAIL MOUNTAIN MINE DISCHARGE
UPDES UG-0400003-002

Kind of sample Water
reported to us

Rec'd 1440 hr.
Sampled 1345 hr.

Sample taken at

FIELD MEASUREMENTS
pH 8.45
DO 8.7
Flow 100 gpm
Conductivity 1250
Temperature 16.3°C

Sample taken by Energy West/Mike

Date sampled June 13, 1997

Date received June 13, 1997

NOTE: Dissolved metals filtered at lab!

Analysis report no. 59-17316

Parameter	Result	MRL	Units	Method	Analyzed		
					Date/Time	Analyst	
Acidity	<10	10	mg/l as CaCO ₃	D1067-92	06-23-1997	0900	RJ
Alkalinity, Bicarbonate	602	5	mg/l as HCO ₃	SM2320-B	06-16-1997	1700	RJ
Alkalinity, Carbonate	14	5	mg/l as CO ₃	SM2320-B	06-16-1997	1700	RJ
Alkalinity, Total	517	5	mg/l as CaCO ₃	EPA 310.1	06-16-1997	1700	RJ
Anions	16.9	----	meq/l	-----	07-08-1997	1600	RJ
Calcium, Dissolved	42	1	mg/l	EPA 215.1	07-08-1997	1045	MK
Cations	17.2	----	meq/l	-----	07-08-1997	1600	RJ
Chloride	39	1	mg/l	SM4500-Cl-B	07-02-1997	0730	RJ
Conductivity	1530	1	umhos/cm	SM2510-B	06-30-1997	0340	RJ
Hardness, Total	204	----	mg/l as CaCO ₃	SM2340-B	07-08-1997	1600	RJ
Iron, Total	1.3	0.1	mg/l	EPA 236.1	07-08-1997	0800	MK
Iron, Dissolved	0.4	0.1	mg/l	EPA 236.1	07-08-1997	0800	MK
Magnesium, Dissolved	24	1	mg/l	EPA 242.1	07-08-1997	1100	MK
Manganese, Total	0.2	0.1	mg/l	EPA 243.1	07-08-1997	0830	MK
Manganese, Dissolved	0.1	0.1	mg/l	EPA 243.1	07-08-1997	0830	MK
Oil & Grease	7	2	mg/l	SM5520-B	06-18-1997	0800	CC
pH	8.48	----	pH units	EPA 150.1	06-14-1997	1020	RJ
Potassium, Dissolved	5	1	mg/l	EPA 258.1	07-08-1997	0900	MK
Sodium, Dissolved	299	5	mg/l	EPA 273.1	07-08-1997	0930	MK
Solids, Settleable	<0.5	0.5	ml/l	EPA 160.5	06-14-1997	1000	RJ
Solids, Total Dissolved	1020	10	mg/l	EPA 160.1	06-19-1997	0900	CC
Solids, Total Suspended	46	5	mg/l	EPA 160.2	06-16-1997	0700	CC
Sulfate	263	83	mg/l	EPA 375.4	07-02-1997	0715	SC
Cation/Anion Balance	0.9	----	%		07-08-1997	1600	RJ

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July 2, 1997

PACIFICORP FIELD OFFICE
 P.O. Box 1005
 Huntington UT 84528

Sample identification by
 PACIFICORP FIELD OFFICE

TRAIL MOUNTAIN DISCHARGE

Kind of sample reported to us Water

Rec'd 1230 hr.
 Sampled 1800 hr.

Sample taken at

FIELD MEASUREMENTS
 Flow 100 gpm

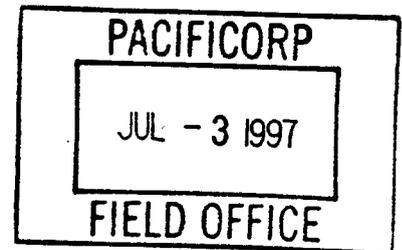
Sample taken by Energy West/Delivered for C.S.

Date sampled June 15, 1997

Date received June 16, 1997

Analysis report no. 59-17317

Parameter	Result	MRL	Units	Method	Analyzed	
					Date/Time	Analyst
Iron, Total	1.2	0.1	mg/l	EPA 236.1	06-19-1997 0900	MK
Solids, Total Dissolved	990	10	mg/l	EPA 160.1	06-19-1997 0900	CC
Solids, Total Suspended	13	5	mg/l	EPA 160.2	06-19-1997 0900	CC



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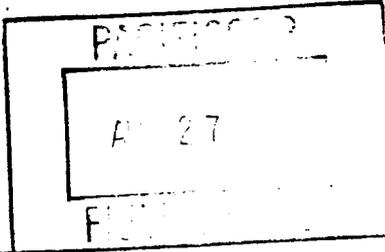


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August 27, 1997

PACIFICORP FIELD OFFICE
P.O. Box 1005
Huntington UT 84528



Sample identification by
PACIFICORP FIELD OFFICE

TRAIL MOUNTAIN MINE DISCHARGE
UPDES UG-040003-002

Rec'd 1010 hr.
Sampled 0858 hr.

Kind of sample reported to us Water

Sample taken at TRAIL MOUNTAIN

Sample taken by ENERGY WEST/MBD

Date sampled July 23, 1997

Date received July 23, 1997

FIELD MEASUREMENTS

pH 8.09
DO 5.9
Flow 180 gpm
Conductivity 1279
Temperature 16.5°C

NOTE: DISSOLVED METALS FILTERED AT LAB!

Analysis report no. 59-17520

Parameter	Result	MRL	Units	Method	Analyzed	
					Date/Time	Analyst
Acidity	22	10	mg/l as CaCO ₃	D1067-92	07-28-1997 1030	SC
Alkalinity, Bicarbonate	596	5	mg/l as HCO ₃	SM2320-B	07-30-1997 0730	SC
Alkalinity, Carbonate	<5	5	mg/l as CO ₃	SM2320-B	07-30-1997 0730	SC
Alkalinity, Total	489	5	mg/l as CaCO ₃	EPA 310.1	07-30-1997 0730	SC
Anions	15.4	----	meq/l	-----	08-25-1997 0920	MK
Calcium, Dissolved	49	1	mg/l	EPA 215.1	08-21-1997 1330	MK
Cations	16.6	----	meq/l	-----	08-25-1997 0920	RJ
Chloride	36	1	mg/l	SM4500-Cl-B	08-01-1997 1010	SC
Conductivity	1463	1	umhos/cm	SM2510-B	08-11-1997 0800	JC
Hardness, Total	217	----	mg/l as CaCO ₃	SM2340-B	08-25-1997 0920	RJ
Iron, Total	1.4	0.1	mg/l	EPA 236.1	08-13-1997 0800	MK
Iron, Dissolved	0.3	0.1	mg/l	EPA 236.1	08-13-1997 0800	MK
Magnesium, Dissolved	23	1	mg/l	EPA 242.1	08-21-1997 1345	MK
Manganese, Total	0.1	0.1	mg/l	EPA 243.1	08-13-1997 0815	MK
Manganese, Dissolved	<0.1	0.1	mg/l	EPA 243.1	08-13-1997 0815	MK
Oil & Grease	<2	2	mg/l	SM5520-B	08-04-1997 0700	JC
pH	8.07	----	pH units	EPA 150.1	07-23-1997 0900	MK
Potassium, Dissolved	3	1	mg/l	EPA 258.1	08-13-1997 0845	MK
Sodium, Dissolved	281	1	mg/l	EPA 273.1	08-21-1997 0900	MK
Solids, Settleable	<0.5	0.5	ml/l	EPA 160.5	07-23-1997 1030	MK
Solids, Total Dissolved	940	10	mg/l	EPA 160.1	07-28-1997 0700	JC
Solids, Total Suspended	14	5	mg/l	EPA 160.2	07-28-1997 0700	JC
Sulfate	277	50	mg/l	EPA 375.4	08-08-1997 0830	SC
Cation/Anion Balance	3.9	----	%		08-25-1997 0920	RJ

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September 17, 1997

PACIFICORP FIELD OFFICE
P.O. Box 1005
Huntington UT 84528

Sample identification by
PACIFICORP FIELD OFFICE

Kind of sample reported to us WATER

Rec'd @ EW Sep 22

Sample taken at TRAIL MOUNTAIN

Sample taken by ENERGY WEST/MBD

Date sampled August 28, 1997

Date received August 28, 1997

TRAIL MOUNTAIN
MINE DISCHARGE
UPDES UG-040003-002
Rec'd 0745 hr.
Sampled 0700 hr.

FIELD MEASUREMENTS

pH 8.51
DO 5.9
Flow 180 GPM
Conductivity 1280
Temperature 16.9°C

Dissolved metals filtered @ lab!

Analysis report no. 59-17671

Parameter	Result	MRL	Units	Method	Analyzed	
					Date/Time	Analyst
Acidity	<10	10	mg/l as CaCO ₃	D1067-92	09-10-1997 0900	BT
Alkalinity, Bicarbonate	688	5	mg/l as HCO ₃	SM2320-B	09-05-1997 0600	BT
Alkalinity, Carbonate	12	5	mg/l as CO ₃	SM2320-B	09-05-1997 0600	BT
Alkalinity, Total	583	5	mg/l as CaCO ₃	EPA 310.1	09-05-1997 0600	BT
Anions	16.5	----	meq/l	-----	09-16-1997 0700	BT
Calcium, Dissolved	20	1	mg/l	EPA 215.1	09-09-1997 1100	BT
Cations	16.9	----	meq/l	-----	09-16-1997 1400	BT
Chloride	37	10	mg/l	SM4500-Cl-B	09-05-1997 0800	BT
Conductivity	1473	1	umhos/cm	SM2510-B	09-16-1997 1200	BT
Hardness, Total	936	----	mg/l as CaCO ₃	SM2340-B	09-16-1997 1400	BT
Iron, Total	1.2	0.1	mg/l	EPA 236.1	09-09-1997 0900	BT
Iron, Dissolved	0.3	0.1	mg/l	EPA 236.1	09-09-1997 0900	BT
Magnesium, Dissolved	17	1	mg/l	EPA 242.1	09-09-1997 1115	BT
Manganese, Total	<0.1	0.1	mg/l	EPA 243.1	09-09-1997 0915	BT
Manganese, Dissolved	<0.1	0.1	mg/l	EPA 243.1	09-09-1997 0915	BT
Oil & Grease	2	2	mg/l	SM5520-B	09-04-1997 0700	BT
pH	8.49	----	pH units	EPA 150.1	08-28-1997 1420	BT
Potassium, Dissolved	5	1	mg/l	EPA 258.1	09-09-1997 0945	BT
Sodium, Dissolved	330	2	mg/l	EPA 273.1	09-09-1997 1000	BT
Solids, Settleable	<0.5	0.5	ml/l	EPA 160.5	08-28-1997 1300	BT
Solids, Total Dissolved	920	10	mg/l	EPA 160.1	09-02-1997 0700	BT
Solids, Total Suspended	42	5	mg/l	EPA 160.2	09-02-1997 0700	BT
Sulfate	182	83	mg/l	EPA 375.4	09-04-1997 0900	BT
Non Anion Balance	1.1	----	%	-----	09-16-1997 1400	BT

Respectfully submitted,
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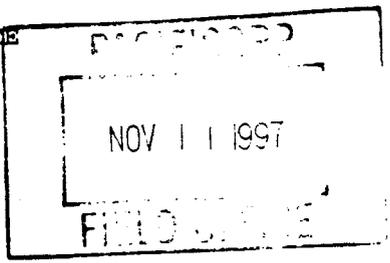
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November 11, 1997

PACIFICORP FIELD OFFICE
 P.O. Box 1005
 Huntington, UT 84528



Sample identification by
 PACIFICORP FIELD OFFICE

TRAIL MOUNTAIN
 MINE DISCHARGE UPDES UG-04003-002
 Rec'd 1530 hr.
 Sampled 0723 hr.

Kind of sample Water reported to us
 Sample taken at Trail Mountain
 Sample taken by Energy West/MBD
 Date sampled October 28, 1997
 Date received October 28, 1997

FIELD MEASUREMENTS
 pH 8.94
 DO 6.5
 Flow 400 gpm
 Conductivity 1313
 Temperature 12.6°C

NOTE: Dissolved metals filtered at lab
 NOTE: TSS expired when analyzed

Analysis report no. 59-18012

Parameter	Result	MRL	Units	Method	Analyzed		
					Date/Time	Analyst	SC
Acidity	<10	10	mg/l as CaCO ₃	D1067-92	11-10-1997	0900	SC
Alkalinity, Bicarbonate	775	5	mg/l as HCO ₃	SM2320-B	11-03-1997	0900	SC
Alkalinity, Carbonate	<5	5	mg/l as CO ₃	SM2320-B	11-03-1997	0900	SC
Alkalinity, Total	635	5	mg/l as CaCO ₃	EPA 310.1	11-03-1997	0900	SC
Ammonia	17.3	----	meq/l	-----	11-11-1997	1000	SC
Barium, Dissolved	20	1	mg/l	EPA 215.1	11-07-1997	0845	SC
Boron	16.4	----	meq/l	-----	11-11-1997	1000	SC
Bromide	29	1	mg/l	SM4500-Cl-B	11-04-1997	1230	SC
Chloride	1529	1	umhos/cm	SM2510-B	10-28-1997	2215	SC
Conductivity	116	----	mg/l as CaCO ₃	SM2340-B	11-11-1997	1000	SC
Hardness, Total	1.0	0.1	mg/l	EPA 236.1	11-07-1997	0700	SC
Iron, Total	0.4	0.1	mg/l	EPA 236.1	11-07-1997	0700	SC
Iron, Dissolved	16	1	mg/l	EPA 242.1	11-07-1997	0900	SC
Magnesium, Dissolved	<0.1	0.1	mg/l	EPA 243.1	11-07-1997	0715	SC
Manganese, Total	<0.1	0.1	mg/l	EPA 243.1	11-07-1997	0715	SC
Manganese, Dissolved	<2	2	mg/l	SM5520-B	10-31-1997	0700	SC
Oil & Grease	8.28	----	pH units	EPA 150.1	10-28-1997	2145	SC
Potassium, Dissolved	5	1	mg/l	EPA 258.1	11-07-1997	0745	SC
Sodium, Dissolved	321	5	mg/l	EPA 273.1	11-07-1997	0800	SC
Solids, Settling	<0.5	0.5	ml/l	EPA 160.5	10-28-1997	1745	SC
Solids, Total Dissolved	1020	10	mg/l	EPA 160.1	10-29-1997	0700	SC
Solids, Total Suspended	14	5	mg/l	EPA 160.2	11-04-1997	0900	SC
Sulfate	183	50	mg/l	EPA 375.4	10-29-1997	1400	SC
Iron/Anion Balance	-2.7	----	%	-----	11-11-1997	1000	SC

Respectfully submitted,
 COMMERCIAL TESTING & ENGINEERING CO.

Huntington Laboratory



OVER 40 BRANCH LABORATORIES STRATEGICALLY LOCATED IN PRINCIPAL COAL MINING AREAS, TIDEWATER AND GREAT LAKES PORTS, AND RIVER LOADING FACILITIES

COMMERCIAL TESTING & ENGINEERING CO.

GENERAL OFFICES: 1919 SOUTH HIGHLAND AVE., SUITE 210-B, LOMBARD, ILLINOIS 60148 • TEL: 630-953-9300 FAX: 630-953-9306



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 FAX: (801) 653-2436

December 11, 1997
 PACIFICORP FIELD OFFICE
 P.O. Box 1005
 Huntington UT 84528

Energy West Mining Co.
 Vendor _____ Processed by _____
 PD _____ Date _____
 Office _____ JID # _____
 Received **DEC 19 1997** AP Department
 Comments _____

Sample identification by
 PACIFICORP FIELD OFFICE

TRAIL MOUNTAIN
 MINE DISCHARGE
 UPDES UG-040003-002
 Rec'd 1430 hr.
 Sampled 1251 hr.

Kind of sample reported to us

Water

Sample taken at Trail Mountain

Sample taken by Energy West/MBD

Date sampled November 13, 1997

Date received November 13, 1997

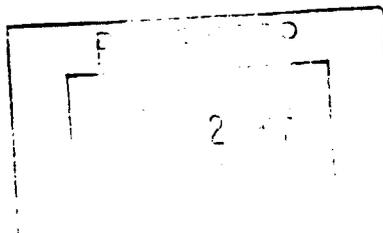
FIELD MEASUREMENTS

pH 8.92
 DO 5.8
 Flow 200 GPM
 Conductivity 1384
 Temperature 13.6°C

NOTE: DISSOLVED METALS FILTERED AT LAB

Analysis report no. 59-18087

Parameter	Result	MRL	Units	Method	Analyzed	
					Date/Time	Analyst
Acidity	<10	10	mg/l as CaCO ₃	D1067-92	11-19-1997	1300 SC
Alkalinity, Bicarbonate	747	5	mg/l as HCO ₃	SM2320-B	11-17-1997	1130 SC
Alkalinity, Carbonate	<5	5	mg/l as CO ₃	SM2320-B	11-17-1997	1130 SC
Alkalinity, Total	612	5	mg/l as CaCO ₃	EPA 310.1	11-17-1997	1130 SC
Anions	17.9	----	meq/l	-----	12-11-1997	1100 RB
Calcium, Dissolved	23	1	mg/l	EPA 215.1	11-17-1997	2300 MK
Cations	16.5	----	meq/l	-----	12-11-1997	1100 RB
Chloride	35	1	mg/l	SM4500-C1-B	11-19-1997	0930 SC
Conductivity	1541	1	umhos/cm	SM2510-B	11-14-1997	1700 MK
Hardness, Total	127	----	mg/l as CaCO ₃	SM2340-B	12-11-1997	1100 RB
Iron, Total	1.0	0.1	mg/l	EPA 236.1	11-17-1997	2000 MK
Iron, Dissolved	0.4	0.1	mg/l	EPA 236.1	11-17-1997	2000 MK
Magnesium, Dissolved	17	1	mg/l	EPA 242.1	11-18-1997	1200 MK
Manganese, Total	<0.1	0.1	mg/l	EPA 243.1	11-17-1997	2100 MK
Manganese, Dissolved	<0.1	0.1	mg/l	EPA 243.1	11-17-1997	2100 MK
Oil & Grease	<2	2	mg/l	SM5520-B	11-18-1997	0700 CC
pH	8.23	----	pH units	EPA 150.1	11-13-1997	1500 SC
Potassium, Dissolved	5	1	mg/l	EPA 258.1	11-17-1997	2130 MK
Sodium, Dissolved	318	5	mg/l	EPA 273.1	11-17-1997	2200 MK
Solids, Settleable	<0.5	0.5	ml/l	EPA 160.5	11-14-1997	1615 MK
Solids, Total Dissolved	930	10	mg/l	EPA 160.1	11-20-1997	0700 CC
Solids, Total Suspended	19	5	mg/l	EPA 160.2	11-20-1997	0700 CC
Sulfate	224	125	mg/l	EPA 375.4	12-10-1997	1230 SC
Cation/Anion Balance	-4.0	----	%		12-11-1997	1100 RB



Respectfully submitted,
 COMMERCIAL TESTING & ENGINEERING CO.

Larry Stout

Huntington Laboratory



OVER 40 BRANCH LABORATORIES STRATEGICALLY LOCATED IN PRINCIPAL COAL MINING AREAS, TIDEWATER AND GREAT LAKES PORTS, AND RIVER LOADING FACILITIES

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HUNTINGTON, UT 84528
TEL: (801) 653-2311
FAX: (801) 653-2436

January 2, 1998

PACIFICORP FIELD OFFICE
P.O. Box 1005
Huntington UT 84528

Sample identification by
PACIFICORP FIELD OFFICE

TRAIL MOUNTAIN
MINE DISCHARGE
UPDES UG 040003-002

Rec'd 0945 hr.
Sampled 0819 hr.

Kind of sample reported to us Water
Sample taken at Trail Mountain
Sample taken by Energy West/MBD
Date sampled December 16, 1997
Date received December 16, 1997

FIELD MEASUREMENTS
pH 8.88
Flow 100 GPM
Conductivity 1290
Temperature 13°C

NOTE: Dissolved metals filtered at lab

Analysis report no. 59-18165

Parameter	Result	MRL	Units	Method	Analyzed	
					Date/Time	Analyst
Acidity	<10	10	mg/l as CaCO ₃	D1067-92	12-23-1997 0900	RJ
Alkalinity, Bicarbonate	781	5	mg/l as HCO ₃	SM2320-B	12-18-1997 1200	CC
Alkalinity, Carbonate	<5	5	mg/l as CO ₃	SM2320-B	12-18-1997 1200	CC
Alkalinity, Total	640	5	mg/l as CaCO ₃	EPA 310.1	12-18-1997 1200	CC
Anions	16.7	----	meq/l	-----	01-02-1998 0930	RJ
Calcium, Dissolved	20	1	mg/l	EPA 215.1	12-18-1997 1400	MK
Cations	17.5	----	meq/l	-----	01-02-1998 0930	RJ
Chloride	10	1	mg/l	SM4500-Cl-B	12-23-1997 1030	CC
Conductivity	1497	1	umhos/cm	SM2510-B	12-24-1997 1200	RJ
Hardness, Total	116	----	mg/l as CaCO ₃	SM2340-B	01-02-1998 0930	RJ
Iron, Total	1.0	0.1	mg/l	EPA 236.1	12-18-1997 1200	MK
Iron, Dissolved	0.4	0.1	mg/l	EPA 236.1	12-18-1997 1200	MK
Magnesium, Dissolved	16	1	mg/l	EPA 242.1	12-18-1997 1415	MK
Manganese, Total	<0.1	0.1	mg/l	EPA 243.1	12-18-1997 1215	MK
Manganese, Dissolved	<0.1	0.1	mg/l	EPA 243.1	12-18-1997 1215	MK
Oil & Grease	<2	2	mg/l	SM5520-B	12-19-1997 0700	CC
pH	8.22	----	pH units	EPA 150.1	12-16-1998 1000	MK
Potassium, Dissolved	5	1	mg/l	EPA 258.1	12-18-1997 1300	MK
Sodium, Dissolved	345	5	mg/l	EPA 273.1	12-18-1997 1315	MK
Solids, Settleable	<0.5	0.5	ml/l	EPA 160.5	12-16-1997 1000	MK
Solids, Total Dissolved	940	10	mg/l	EPA 160.1	12-16-1997 0700	CC
Solids, Total Suspended	15	5	mg/l	EPA 160.2	12-16-1997 0700	CC
Sulfate	173	125	mg/l	EPA 375.4	12-30-1997 0900	CC
Cation/Anion Balance	2.2	----	%		01-02-1998 0930	RJ

Respectfully submitted,
COMMERCIAL TESTING & ENGINEERING CO.

Larry Stout

Huntington Laboratory *RS*



OVER 40 BRANCH LABORATORIES STRATEGICALLY LOCATED IN PRINCIPAL COAL MINING AREAS, TIDEWATER AND GREAT LAKES PORTS, AND RIVER LOADING FACILITIES

TERMS AND CONDITIONS ON REVERSE

*Energy West Mining Co.
P.O. Box 310
Huntington, UT 84528*

Appendix B
Sample Location Data of the Cottonwood Canyon Creek for the Years
1996 and 1997
Mass Balance Calculations

*Energy West Mining Co.
P.O. Box 310
Huntington, UT 84528*

1996

Water Quality Report: Operational

20-Apr-98

LOCATION GROUP: TMSURF

LOCATION: SW-1	HISTORICAL DATA FOR DATE: 19960101 THROUGH 19961231				
PARAMETER	MAXIMUM	MINIMUM	AVERAGE	# ANALYSES	SUM
BICARB:	413	288	376	4	1504
CALCIUM:	77	63	69.75	4	279
CARBONATE:	12	12	12	1	12
CHLORIDE:	18	9	14.75	4	59
CONDUCT:	822	537	728.5	4	2914
DISS_OXY:	10.9	7.6	8.9	3	26.7
FLOW:	800	6.67	207.42	4	829.67
HARDNESS:	425	293	376.5	4	1506
IRON_TOT:	0.7	0.1	0.4	2	0.8
IRON DISS:				0	
MAGNESIUM:	56	33	49	4	196
MANG DISS:				0	
MANGANESE:				0	
OIL_GREASE:				0	
PH:	8.35	8	8.185	4	32.74
POTASSIUM:	2	1	1.65	4	6.6
SET SOLIDS:				0	
SODIUM:	23	12	20	4	80
SULFATE:	108	29	78.25	4	313
SUSPENDED:	36	36	36	1	36
TEMP_WATE	19.5	1.7	10.85	4	43.4
TDS:	518	308	446.25	4	1785
DEPTH:				0	

Water Quality Report: Operational

20-Apr-98

LOCATION GROUP: TMSURF

LOCATION: SW-2	HISTORICAL DATA FOR DATE: 19960101 THROUGH 19961231				
PARAMETER	MAXIMUM	MINIMUM	AVERAGE	# ANALYSES	SUM
BICARB:	454	233	347.67	3	1043
CALCIUM:	73	65	69.333	3	208
CARBONATE:	41	16	25.333	3	76
CHLORIDE:	128	12	56.667	3	170
CONDUCT:	1709	563	1043	3	3129
DISS_OXY:	10.9	7.3	9.1	2	18.2
FLOW:	850	2	295.67	3	887
HARDNESS:	631	323	462	3	1386
IRON_TOT:	1.3	0.4	0.85	2	1.7
IRON DISS:				0	
MAGNESIUM:	109	39	70	3	210
MANG DISS:				0	
MANGANESE:				0	
OIL GREASE:				0	
PH:	8.63	8.13	8.4467	3	25.34
POTASSIUM:	24	2	9.5667	3	28.7
SET SOLIDS:				0	
SODIUM:	158	14	68.667	3	206
SULFATE:	254	44	151.67	3	455
SUSPENDED:	78	20	49	2	98
TEMP_WATE	18.3	5.5	12.4	3	37.2
TDS:	1170	332	680.67	3	2042
DEPTH:				0	

Water Quality Report: Operational

20-Apr-98

LOCATION GROUP: TMSURF

LOCATION: SW-3

HISTORICAL DATA FOR DATE: 19960101 THROUGH 19961231

PARAMETER	MAXIMUM	MINIMUM	AVERAGE	# ANALYSES	SUM
BICARB:	452	265	385.25	4	1541
CALCIUM:	111	55	91.25	4	365
CARBONATE:	20	20	20	1	20
CHLORIDE:	78	20	56.25	4	225
CONDUCT:	1491	651	1237.3	4	4949
DISS_OXY:	10.7	7	9.1	3	27.3
FLOW:	1000	10	261.25	4	1045
HARDNESS:	652	327	563.25	4	2253
IRON_TOT:	0.6	0.6	0.6	1	0.6
IRON DISS:				0	
MAGNESIUM:	95	46	81.5	4	326
MANG DISS:				0	
MANGANESE:				0	
OIL_GREASE:	3	3	3	1	3
PH:	8.51	8.03	8.25	4	33
POTASSIUM:	4	2	3.05	4	12.2
SET SOLIDS:				0	
SODIUM:	100	25	78	4	312
SULFATE:	398	100	267.25	4	1069
SUSPENDED:	38	38	38	1	38
TEMP_WATE	19.9	1.6	12.85	4	51.4
TDS:	1052	400	852.25	4	3409
DEPTH:				0	

*Energy West Mining Co.
P.O. Box 310
Huntington, UT 84528*

1997

Water Quality Report: Operational

20-Apr-98

LOCATION GROUP: TMSURF

LOCATION: SW-1

HISTORICAL DATA FOR DATE: 19970101 THROUGH 19971231

PARAMETER	MAXIMUM	MINIMUM	AVERAGE	# ANALYSES	SUM
BICARB:	422	304	346.5	4	1386
CALCIUM:	77	54	60.75	4	243
CARBONATE:	5	5	5	1	5
CHLORIDE:	22	8	14	4	56
CONDUCT:	802	528	614.75	4	2459
DISS_OXY:	7.7	7.1	7.4	2	14.8
FLOW:	250	11	94	4	376
HARDNESS:	419	246	300	4	1200
IRON_TOT:	1	0.2	0.6667	3	2
IRON DISS:				0	
MAGNESIUM:	55	27	36	4	144
MANG DISS:				0	
MANGANESE:				0	
OIL GREASE:				0	
PH:	8.47	8.12	8.23	4	32.92
POTASSIUM:	2	1	1.6667	3	5
SET SOLIDS:				0	
SODIUM:	23	9	13.25	4	53
SULFATE:	110	32	58.5	4	234
SUSPENDED:	78	6	43	3	129
TEMP_WATE	12.1	1.8	7.775	4	31.1
TDS:	500	300	350	4	1400
DEPTH:				0	

PACIFICORP TECHNICAL SERVICES - HYDROLOGIC MONITORING

COTTONWOOD CANYON CREEK FLOW & QUALITY

SW-1

Date	Time	Field Measurements					Dis. Oxygen	Weather	Comments
		emp. (oC)	Flow GPM	pH	Cond. (uS)				
1/31/97	1045		INACCESSIBLE					clear30's	
2-31-97	1132		5					clear20's	
3/10/97	1115	9.1	11	8.08	723	7.7		clear50's	
4/7/97	1238		60					pc40's	
5/27/97	1140		750					clear50's	
6/23/97	759	8.1	250	8.41	480	NA		clear60's	
7/23/97	918		200					cloudy70's	
8/25/97	1230		60					clear80's	
9/8/97	956	12.1	80	8.27	484	7.1		clear70's	
10/14/97	952		60					clear50's	
11/21/97	1050		30					pc30's	
12/5/97	1117	1.8	35	8.55	535	8		cloudy20's	
		Average	140.09						

Water Quality Report: Operational

20-Apr-98

LOCATION GROUP: TMSURF

LOCATION: SW-2

HISTORICAL DATA FOR DATE: 19970101 THROUGH 19971231

PARAMETER	MAXIMUM	MINIMUM	AVERAGE	# ANALYSES	SUM
BICARB:	606	308	444.5	4	1778
CALCIUM:	69	29	50.5	4	202
CARBONATE:	85	85	85	1	85
CHLORIDE:	179	10	79.75	4	319
CONDUCT:	1344	531	1067	4	4268
DISS_OXY:	8.4	6.6	7.5	2	15
FLOW:	280	18	157	4	628
HARDNESS:	460	151	287.5	4	1150
IRON_TOT:	1.4	0.4	0.825	4	3.3
IRON DISS:	0.2	0.1	0.15	2	0.3
MAGNESIUM:	65	19	38	4	152
MANG DISS:	0.3	0.3	0.3	1	0.3
MANGANESE:	0.1	0.1	0.1	1	0.1
OIL_GREASE:	39	39	39	1	39
PH:	8.64	8.44	8.5325	4	34.13
POTASSIUM:	4	1	2.75	4	11
SET_SOLIDS:				0	
SODIUM:	221	11	124.75	4	499
SULFATE:	153	35	118.25	4	473
SUSPENDED:	148	10	62.75	4	251
TEMP_WATE	16	4.5	8.5	4	34
TDS:	840	310	650	4	2600
DEPTH:				0	

PACIFICORP
TECHNICAL SERVICES - HYDROLOGIC MONITORING

COTTONWOOD CANYON CREEK FLOW & QUALITY

SW-2

Date	Time	Field Measurements					Weather	Comments
		emp. (oC)	Flow GPM	pH	Cond. (uS)	Dis. Oxygen		
1/31/97	1050		DRY				clear30's	
2-31-97	1140		10				clear20's	
3/10/97	1128	4.6	18	8.48	1217	8.4	clear50's	
4/7/97	1247		65				pc40's	
5/27/97	1219		750				clear50's	
6/23/97	834	8.9	250	8.5	479	NA	clear60's	
7/23/97	923		400				cloudy70's	
8/25/97	1235		460				clear80's	
9/8/97	1044	16	280	8.72	1024	6.6	clear70's	
10/14/97	1018		90				clear50's	
11/21/97	1100		200				pc30's	
12/5/97	1130	4.5	80	8.92	1101	7.9	cloudy20's	
		Average	236.64					

Water Quality Report: Operational

20-Apr-98

LOCATION GROUP: TMSURF

LOCATION: SW-3

HISTORICAL DATA FOR DATE: 19970101 THROUGH 19971231

PARAMETER	MAXIMUM	MINIMUM	AVERAGE	# ANALYSES	SUM
BICARB:	569	350	479.25	4	1917
CALCIUM:	115	32	56.75	4	227
CARBONATE:	18	10	14	2	28
CHLORIDE:	95	22	48.25	4	193
CONDUCT:	1595	795	1224.3	4	4897
DISS_OXY:	8.2	6.7	7.45	2	14.9
FLOW:	400	6.67	215.42	4	861.67
HARDNESS:	687	181	329	4	1316
IRON_TOT:	1.1	0.5	0.9	3	2.7
IRON DISS:	0.2	0.1	0.1667	3	0.5
MAGNESIUM:	97	24	45.5	4	182
MANG DISS:	0.2	0.2	0.2	1	0.2
MANGANESE:	0.1	0.1	0.1	1	0.1
OIL GREASE:	28	28	28	1	28
PH:	8.62	8.22	8.465	4	33.86
POTASSIUM:	4	2	3.5	4	14
SET SOLIDS:				0	
SODIUM:	220	67	152.5	4	610
SULFATE:	438	121	228	4	912
SUSPENDED:	114	11	77.667	3	233
TEMP_WATE	16.6	1.6	9.9	4	39.6
TDS:	1130	490	797.5	4	3190
DEPTH:				0	

PACIFICORP TECHNICAL SERVICES - HYDROLOGIC MONITORING

COTTONWOOD CANYON CREEK FLOW & QUALITY

SW-3

Date	Time	Field Measurements					Dis. Oxygen	Weather	Comments
		emp. (oC)	Flow GPM	pH	Cond. (uS)				
1/31/97	1300		5					clear30's	
2-31-97	1210		5					clear20's	
3/10/97	1150	9.9	6.67	8.32	1386	8.2		clear50's	
4/7/97	1336		10					pc40's	
5/27/97	1232		1000					clear50's	
6/23/97	922	11.6	400	8.55	710	NA		clear60's	
7/23/97	937		500					cloudy70's	
8/25/97	1248		450					clear80's	
9/8/97	1103	16.6	280	8.66	1071	6.7		clear70's	
10/14/97	1018		150					clear50's	
11/21/97	1120		180					pc30's	
12/5/97	1148	1.6	175	8.7	1177	8.2		cloudy20's	
		Average	263.47						

Mass Balance

Cottonwood Canyon Creek (SW-1)

TDS
350 mg/L

Flow (Q₁)
140.09 gpm

Loading (W₁)
589.20 lbs/day

Mine Discharge (UT04003-002)

TDS
954.3 mg/L

Flow (Q₂)
150.67 gpm

Loading (W₂)
1727.83 lbs/day

$$W_1 + W_2 = W_T$$

$$W_T = (589.20 + 1727.83) \text{ lbs/day} = 2317.03 \text{ lbs/day} = 1.61 \text{ lbs/min.}$$

$$Q_1 + Q_2 = Q_T = (140.09 + 150.67) \text{ gpm} = 290.76 \text{ gpm}$$

$$\frac{1.61 \text{ lbs/day}}{290.76 \text{ gpm}} = 5.53 \times 10^{-3} \text{ lbs/gal}$$

$$(5.53 \times 10^{-3} \text{ lbs/gal}) \left(\frac{1 \text{ gal}}{3.79 \text{ L}} \right) \left(\frac{453.6 \text{ grams}}{1 \text{ lb.}} \right) \left(\frac{1000 \text{ mg}}{\text{grams}} \right)$$

$$= 662.42 \text{ mg/L (TDS concentration immediately below the mine)}$$