

July 17, 2003

TO: Internal File

THRU: Daron Haddock, Permit Supervisor

FROM: David Darby, Senior Reclamation Specialist

RE: 2003 First Quarter Water Monitoring, Consolidation Coal Company, Emery Deep Mine, C/015/015-WQ03-1

- 1. Was data submitted for all of the MRP required sites?** YES [X] NO []
Identify sites not monitored and reason why, if known:

File O:\015015.emc\waterquality\datacheck070303.xls is the working spreadsheet to track submissions and trends of surface and groundwater data in the DOGM Water Quality Database from years 2000 to 2003, submitted by Consolidation Coal Company.

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

See Technical Directive 004 for baseline resampling requirements. Consider the five-year baseline resubmittal when responding to question one above. Indicate if the MRP does not have such a requirement.

Resampling due date January 2008.

- 3. Were all required parameters reported for each site?** YES [] NO [X]
Comments, including identity of monitoring site:

Section VI of the MRP contains Tables VI-21 and 22 identify the monitoring sites, monitoring frequency and Parameters that need to be sampled. The operator presents a parameter list in the first column of Table VI-23. It shows springs and wells have the same parameters list. The operator is collecting only flow water level data, thus the parameter list should be changed.

The spreadsheet separates water monitoring sites by type, that is, wells springs, streams and UPDES sites. The Spring monitoring requirements should be separated from the well monitoring requirements in Table VI-22 of the MRP. I discussed this issue with Tim Kirschbaum on July 15, 2003 and Jim Byars on July 16, 2003.

4. Were irregularities found in the data? YES [X] NO []
Comments, including identity of monitoring site:

Wells

The operator monitored all but 5 wells during the first quarter. Wells R1-L, T1-U and ZZ-L were not accessed. No explanation was given. No levels were reported for the Kemmer well or Well SM1-2. The operator reported depth of water in the wells only, water levels were not reported. Water quality sampling is not required during the first quarter. Wells T1-U and T2-U are not shown on the monitoring schedule, but are in the database. They do not show a monitoring frequency listed in Table VI-22. I called James Byars, he said he would check on a monitoring schedule and location, then get back with me.

Springs

All springs flows were monitored during the quarter, no water quality samples were required

Streams

Stream monitoring data was not in the database for the first quarter. In the past the operator has not reported concentrations of oil/grease, levels of total Potassium, Calcium and Sodium, which are required in the monitoring program, Table VI-23.

5. Were DMR forms submitted for all required sites?
1st month, YES [] NO [X]
2nd month, YES [] NO [X]
3rd month, YES [] NO [X]
Identify sites and months not monitored:

6. Were all required DMR parameters reported? YES [] NO [X]
Comments, including identity of monitoring site:

7. Were irregularities found in the DMR data? YES [] NO []
Comments, including identity of monitoring site:

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See above

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

I have contacted with James Byars on July 16, 2003 to let him know there are discrepancies in the quarterly data. We plan to meet to reevaluate the monitoring plan. He is currently on vacation. When he returns, I will meet with him and show him the discrepancies in the reported data.

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