

July 17, 2003

TO: Internal File  
THRU: Daron Haddock, Permit Supervisor  
FROM: David Darby, Senior Reclamation Specialist  
RE: 2000 1<sup>st</sup> Quarter Water Monitoring, Consolidation Coal Company, Emery Deep Mine, C/015/015

**1. Was data submitted for all of the MRP required sites?** YES  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   
*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 Kirshbaum 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:*

Well monitoring data

The database shows no water level data for wells during the 1st quarter of 2000. A good amount of data has been submitted and is located in the Blue Book.

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.

Springs

No data was in the data base for springs for the 1<sup>st</sup> quarter. The hardcopy data contains some some information on the springs.

**5. Were DMR forms submitted for all required sites?**

1 <sup>st</sup> month,	YES [X]	NO [X]
2 <sup>nd</sup> month,	YES [X]	NO [X]
3 <sup>rd</sup> month,	YES [X]	NO [ ]

*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 [ X ] NO [ ]  
*Comments, including identity of monitoring site:*

There were no DMR forms in the Blue Book for January and February.

There is a question about the sedimentation (UPDES) ponds identity that are listed in the database as pond 6. I talked to James Byars on July 16, 2003. When he returns from vacation we will meet to straighten out the numbering convention in the database that causes confusion.

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

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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.

The data for 2000, in the Blue Books, should be entered into the database.

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