

WATER QUALITY MEMORANDUM

Utah Coal Regulatory Program

February 3, 2005

TO: Internal File

THRU: D. Wayne Hedberg, Permit Supervisor

FROM: David Darby, Senior Reclamation Specialist III

RE: 2004, 3rd Quarter Water Monitoring, , Consolidation Coal Company, Emery Deep Mine, C0150015-WQ04-3, Task ID #2129

1. Was data submitted for all of required sites?

The Emery Deep Mine is conducting operations at both the 4th East Portal and main facilities. Coal extraction is only occurring at the 4th East Portal. This report is based on data compiled in file; O:\0150015.em\Water Quality\datacheck2004-1-3format.xls. Table VI-22 identifies the Mine's water monitoring (frequency) plan for springs, streams and wells. Table VI-23 identifies the parameters that will be monitored. Section VI.A.6 of the MRP identifies the UPDES sites, and current status monitoring parameters, discharge limits and monitoring frequency.

Springs During the operational and reclamation phases Christiansen Springs (SP-15) will be monitored quarterly for flow and chemistry during the 2nd and 3rd quarters. Emery Co. #1 (SP-10), Emery Co. #2 (SP-11), Bryant #1 (SP-14) and Bryant #2 (SP-13) spring will be monitored quarterly for flow.

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

Streams Surface Water sites 1, 1A, 2, 3, 4, 5, 8, 9 and 10 are monitored for flow and chemistry once each calendar quarter.

YES **NO** **Data was reported for all monitoring sites except sites 8, 9 and 10.**

Wells Water level data will be collected quarterly during the operational and reclamation phases from wells Bryant, EMRIA2, Kemmerer, Lewis, IU2, T1(B), TP(U), USGS1-2, ZZ SM1-1, SM1-2, SM1-3, SM1-4. Wells RDA1-RDA-6 will be tested for water quality annually. Wells AA(B), AA(U), AA(M), AA(L), H(B), H(U), H(M), H(L), I(B), B(M), M(L), R2(B), R2(U), R2(M), R1, T2(B), Muddy

1, Muddy 2, EMRA1, EMRA3, FC346WW, USGS3-1, USGS4-1 and WW1 will be monitored quarterly for water levels, no water quality samples will be taken.

YES [] NO [X] Water levels were measured in all wells except UI2. The pipe going to the well is apparently broken off. It is not known if the well needs to be repaired or if monitoring should cease. The site is still on the monitoring schedule.

UPDES Mine water is pumped directly into the Quitchupah Creek via ponds 001 and 003 under UPDES permit UT0022616. Consol has other sedimentation ponds that treat that UPDES sites for the sedimentation ponds. Consol is required to conduct monthly monitoring UPDES sites under UT0024040, yet monitor twice per month for sites under UT0022616.

YES [] NO [X] Pond 11, under UT0024040, was reported as monitored once a month. The permittee may want to amend the MRP if plans are to report UPDES monitoring for Permit UT0024040 monthly.

2. Were all required parameters reported for each site?

Springs YES [X] NO [] All required information was submitted for the springs.

Streams YES [] NO [X] Parameters were missing with the missed monitoring at sites 8, 9 and 10.

Wells YES [] NO [X] Well IU2 had no data reported. Bryant, SM-1, SM-2, SM-3, SM-4, T1-B, TPU, USGS1-2, ZZ-L and IU-02 were not monitored for chemistry as required in the monitoring plan.

UPDES YES [] NO [X] Section 1 mentioned missing monitoring data. No oil/grease samples were reported for sites 6, 12 and 13 during discharges as required by the UPDES limitations requirements.

3. Were irregularities found in the data?

Springs YES [] NO [X] All required information was submitted for the springs.

Streams YES [] NO [X] Sections 1 and 2 mentioned missing monitoring samples and parameters. No other irregularities were found.

Wells YES [] NO [X] Section 2 mentioned missing monitoring samples. No other irregularities were found.

UPDES YES NO Section 2 mentioned missing parameters. No other irregularities were found.

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

Resampling due date July 2009

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

Both the Operator and Mine Inspector should check to see if missing data identified in Sections 1 and 2 are available to be entered into the database.

Does the Mine Operator need to submit more information to fulfill this quarter's monitoring requirements? 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. 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.

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 previous quarter report has been sent to the operator for review. The missing and irregular data will be tracked to ensure and the database is updated.