

WATER QUALITY MEMORANDUM

Utah Coal Regulatory Program

February 1, 2006

TO: Internal File

THRU: D. Wayne Hedberg, Permit Supervisor

FROM: James D. Smith, Environmental Scientist

RE: 2005 Third Quarter Water Monitoring, PacifiCorp, Des-Bee-Dove Mine, C/015/0017, Task ID #2357

The water-monitoring plan is in Appendix A of Volume 9 of the MRP.

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

The only required monitoring is at the sedimentation pond discharge point, UPDES 0023591-001. The pond did not discharge in July and September 2005 but was decanted in August in preparation for reclamation. Reclamation of the pond was completed in January 2006.

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

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

The following parameters were outside two standard deviations: "n" is the number of values used to calculate the standard deviation in the Division's database.

Flow (n = 263) and sulfate (n = 25).

The sulfate value was 7,407 mg/L, the highest value for this parameter reported at this site. Excluding this latest value, the mean value for sulfate in water decanted from the Des Bee Dove sedimentation pond is 3,292.89 mg/L and one standard deviation is 1838.68 mg/L. The previous high value was 7,240 mg/L (December 2001). So although this reported sulfate concentration is greater than 6,970 mg/L (mean plus two standard deviations), it does not appear to be cause for concern.

Based on measurements of electrical conductivity, TDS in the decant water was 7,763 pounds per day, which is far in excess of the UPDES limit of 2,000 pounds per day. The higher than usual flow was part of the reason for this high daily load. The Permittee notified DEQ of this exceedence in a letter dated September 29, 2005.

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

Renewal submittal is due 10/21/04; renewal is due 02/21/05. Baseline analyses were performed in 1996 and are to be repeated every 5 years, i.e., baseline was to be done in 2001, next baseline analyses is scheduled to be in 2006. However, the UPDES discharge point no longer exists and the reclamation water-monitoring plan does not require further water monitoring at the Des Bee Dove minesite.

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

With the removal and reclamation of the sedimentation pond, the reclamation water-monitoring plan does not require further monthly or quarterly monitoring at the Des Bee Dove minesite.

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 (2nd Qtr 2005), if necessary. NA

8. Did the Mine Operator respond adequately to queries about missing or irregular data?
NA