

WATER QUALITY MEMORANDUM

Utah Coal Regulatory Program

March 28, 2006

TO: Internal File

THRU: D. Wayne Hedberg, Permit Supervisor

FROM: James D. Smith, Environmental Scientist

RE: 2005 Fourth Quarter Water Monitoring, PacifiCorp, Deer Creek Mine, C/015/0018, Task ID #2375

The Deer Creek Mine monitoring plan is described in Appendix A of Volume 9 of the MRP.

1. Were data submitted for all of the MRP required sites?

Springs YES NO

At Rilda Meter 2, NEWUSSD valve and meter problems beyond the control of the Permittee again prevented collection of data. The problems appear to have been resolved at Rilda Meter 3 and the Permittee provided data for that meter for the first time since 4th quarter 2004.

Streams YES NO

Wells YES NO

UPDES YES NO

In-mine YES NO

2. Were all required parameters reported for each site?

Springs YES NO

Rilda Meter 2: valve and meter problems prevented collection of data.

Streams YES NO

Other than flow, field parameters for ICF for October 2005 are not in the database.

Wells YES NO

UPDES YES NO

In-mine YES NO

3. Were any irregularities found in the data?

Listed parameters were outside two standard deviations: “n” is the number of values used to calculate the standard deviation in the Division’s database. An asterisk (*) indicates this is not a parameter required by the MRP.

In-mine YES NO

TW-10 Ca (n = 32), Mg (n = 32), K (n = 31), Na (n = 32), lab specific conductivity* (n = 58), and TDS (n = 60).

Main North- K (n = 32), Na (n = 32), TDS (n = 49), and total anions* (n = 48).
 Main East

Springs YES NO

Elk Spring Mg (n = 16) and cation-anion balance (n = 8).

Sheba Spring Mg (n = 15).

79-10 Mg (n = 16) and cation-anion balance (n = 8).

79-15 Mg (n = 15).

79-34 Mg (n = 9) and water temperature (n = 18).

79-35 Mg (n = 16).

79-38 Lab specific conductivity (n = 32) and total iron (n = 25).

80-48 Water temperature (n = 21) and Mg (n = 12).
JV-9 Flow (n = 10), lab specific conductivity* (n = 9), and TDS (n = 10).
MF-7 Water temperature (n = 10).
MF-213 Water temperature (n = 9), Ca (n = 9), and total hardness (n = 9).
MFR-10 Water temperature (n = 7).
UJV-206 Flow (n = 10).
Little Bear Spring Mg (n = 7).

Streams

YES NO

HCC01 September: Ca (n = 34) and K (n = 25).
HCC02 December: field DO (n = 91).
HCC04 December: field DO (n = 91).
ICD October: flow (n = 6).

UPDES

YES NO

Wells

YES NO

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

Renewal submittal due 10/07/05, renewal due 02/07/06. Baseline analyses were performed in 2001 and will be repeated every 5 years, i.e., the next baseline analyses will be in 2006.

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

This is the fourth quarter the valve at Rilda Meter 2 has been inoperable and prevented scheduled monitoring. NEWUSSD owns this meter and the Permittee cannot repair or replace it without NEWUSSD's cooperation. If NEWUSSD does not replace or repair the valve soon, the Permittee needs to revise the water-monitoring plan.

- 6. Does the Mine Operator need to submit more information to fulfill this quarter's monitoring requirements?** YES NO

Other than flow, field parameters for ICF for October 2005 were not measured.

- 7. Follow-up from last quarter (3rd Qtr 2005), if necessary.** YES NO

The Permittee needs to work with NEWUSSD to promptly resolve the valve problems at Rilda Meter 2.

- 8. Did the Mine Operator respond adequately to queries about missing or irregular data?** YES NO