

WATER QUALITY MEMORANDUM

Utah Coal Regulatory Program

April 7, 2004

TO: Internal File

THRU: Daron R. Haddock, Permit Supervisor

FROM: James D. Smith, Environmental Scientist

RE: 2003 Fourth Quarter Water Monitoring, PacifiCorp, Cottonwood / Wilberg Mine, C/015/0019-WQ03-4, Task ID #1794

The mine was sealed May 10, 2001, so in-mine monitoring sites TMA @ 32 and 2ndS XC-11 are no longer accessible. The pond at the Cottonwood Fan Portal was reclaimed in 2002 and UPDES 22896-002 is no longer reported.

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

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

Renewal submittal due 3/06/04, renewal due 7/06/04. Baseline analyses were performed in 1996 and 2001 and will be repeated every 5 years, i.e., next baseline analyses will be in 2006.

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

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

WCWR1: Field pH (n = 27) was outside the two standard deviation range. Depth and Elevation of Water apparently were entered in the database using meters - rather than feet - as

the unit of measurement; Dennis Oakley provided the correct number and the values in the database have been corrected.

5. Were DMR forms submitted for all required sites?

1st month, YES NO
2nd month, YES NO
3rd month, YES NO

Identify sites and months not monitored:

DMRs were submitted in electronic format (Adobe). Data for all three months were also submitted electronically to the DOGM database.

The pond at the Cottonwood Fan Portal was reclaimed in 2002 and UPDES 22896-002 is no longer reported.

During the second quarter 2003, a sample was collected from some standing water near the Miller Canyon portals to satisfy USFS requirements. It is questionable that this was mine discharge water. Sampling for the USFS requirements will continue semi-annually for two years. The last measured UPDES discharge was July 1996, and the portals are sealed and the area reclaimed.

6. Were all required DMR parameters reported? YES NO

Comments, including identity of monitoring site:

DMR parameters that are not included in the operational parameter lists in the MRP - such as sanitary wastes, visible foam, and floating solids - are not reported on the DMRs or in the electronic submittal.

7. Were irregularities found in the DMR data? YES NO

Comments, including identity of monitoring site:

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

The Permittee needs to assure depths and water elevations are reported in feet rather than meters. Field pH needs to be watched for a trend in increasing acidity.