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WATER QUALITY MEMORANDUM

Utah Coal Regulatory Program

October 21, 2008

TO: Internal File

THRU: Daron Haddock, Permit Supervisor *ADH*

FROM: James D. Smith, Environmental Scientist *JS 10/21/08*

RE: First Quarter 2008 Water Monitoring, PacifiCorp, Cottonwood/Wilberg Mine, C/015/0019, Task # 2710

The Cottonwood/Wilberg Mine monitoring plan is described in Appendix A of Volume 9 of the MRP.

There are no springs monitored at this site. The mine was sealed May 10, 2001, so in-mine monitoring sites TMA @ 32 and 2nd S XC-11 are no longer accessible. WCWR1 at the Waste Rock Site is the only well monitored. The pond at the Cottonwood Fan Portal was reclaimed in 2002 so UPDES 22896-002 is no longer reported to DOGM or the Division of Water Quality.

At UPDES 22896-001 (WMD01), bicarbonate as CaCO₃ was outside two standard deviations from the mean for 7 out of 12 months in 2006, including all 6 months of the 3rd and 4th Quarters, and for the first six months of 2007. As of the 1st Quarter 2008, the standard deviation has become broad enough that the higher values no longer trigger automatic notification, although they remain high in relation to earlier values; however, the values are not extreme and the cation -anion balance is within acceptable limits. Although TDS has increased over this same period of time, sulfate concentration has dropped slightly and offset some of the bicarbonate increase.

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

Streams	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
Wells	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>

UPDES YES NO

DMRs were submitted in electronic format (Adobe). DMR data were submitted to the DOGM database as operational parameters, not as DMR parameters.

2. Were all required parameters reported for each site?

Streams YES NO

Wells YES NO

UPDES YES NO

3. Were any irregularities found in the data?

Listed parameters were outside two standard deviations.

Streams YES NO

Wells YES NO

UPDES YES NO

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

The next renewal submittal is due 03/06/09 for renewal on 07/06/09. Baseline analyses were performed in 2001 and 2006 and will be repeated every 5 years, i.e., the next baseline analyses will be in 2011.

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

No further action is recommended at this time.

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, if necessary.

None.

8. Did the Mine Operator submit all missing and/or irregular data?

NA