Appendix 6.G

Baseline Groundwater Update for Navajo Mine Area IV North

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6.G-1 Introduction

This Appendix has been prepared to summarize and interpret the additional baseline data obtained from monitoring wells and vibrating wire piezometers (VWPs) that were installed in the Fruitland coals and in the underlying Pictured Cliffs Sandstone (PCS) for baseline hydrogeology characterization of Area IV and Area V of the BHP Navajo Coal Company (BNCC) coal lease. Completion diagrams and lithologic logs for these monitoring wells and VWPs are provided in Attachment 6.G-1. The data from these wells and VWPs locations provide additional information on groundwater levels, aquifer characteristics, and groundwater quality within and adjacent to the Navajo Mine permit area. Geologic information as well as data from monitoring wells installed in Area III of the BNCC lease are also included in this Appendix to support the hydrogeologic interpretations. This Appendix also provides the baseline data that are used to support the development and calibration of multilayer, numerical, groundwater flow model of the hydrogeologic system of Areas IV and V of the BNCC coal lease.

The hydrogeologic units within and adjacent to Navajo Mine Area IV North include:

- The alluvial groundwater of the Chaco River, Pinabete Arroyo, and Cottonwood arroyo
- The coal seams of the Fruitland Formation
- The Pictured Cliffs Sandstone (PCS), located below the Fruitland Formation

The location of baseline monitoring wells and VWPs completed within or adjacent to Areas III, IV and V of the BNCC coal lease are shown in Exhibit 6.G-1. This exhibit also provides hydrogeologic sections, depicting the various coal seams of the Fruitland Formation and the top of the PCS. Water level elevations measured in the monitored coal units and in the underlying PCS are plotted in the hydrogeologic sections in Exhibit 6.G-5 to depict both horizontal and vertical gradients.

6.G-2 Alluvial Groundwater

Alluvial fill deposits occur in the valley bottom of Cottonwood Arroyo within the permit area and along the Chaco River and Pinabete Arroyo, to the west and south of the permit area. However, these deposits are not considered Alluvial Valley Floors (AVF). Refer to of Chapter 6.5 for information on the negative determination for AVF within and adjacent to the permit area. The Chaco River alluvium is saturated and provides limited stock water supply at several dug wells. Likewise, portions of the alluvium of Cottonwood and Pinabete Arroyos are saturated and will yield water to wells, as evidenced by the dug wells completed in the alluvium of both Cottonwood and Pinabete Arroyos as indicated in Appendix 6.E.

Baseline monitoring of the alluvium of Cottonwood Arroyo was conducted at four alluvial well monitoring locations shown on Exhibit 6.G-1. Baseline water quality information obtained prior to year 1983 from the monitoring wells GM-17 and QACQ-2 (GM-18) are included in Appendix 6-C. Well GM-17 is completed in the alluvium of North Fork of Cottonwood Arroyo. A dug well, GM-18, completed in the alluvium of Cottonwood Arroyo west of the permit area, was converted for use as a monitoring well and is designated as QACW-2 in Exhibit 6.G-1. This well was included in the Navajo Mine quarterly monitoring program. However, the well is usually dry and relatively few samples have been obtained during baseline monitoring. Water quality samples could not be obtained from alluvial monitoring well QACW-1 because it was dry during baseline monitoring from 1989 through 1998. The well was subsequently removed by the advance of mining operations in Area III. BNCC has also performed baseline monitoring of well QACW–2B completed in the alluvium of Cottonwood Arroyo west of the permit area as shown in Exhibit 6.G-1. This well is a dug well that has been used for stock water supply and is not owned by BNCC.

The baseline water quality monitoring results for these Cottonwood alluvial wells are summarized in Table 6.G-1. These results show the water quality of the alluvium of Cottonwood Arroyo to be a sodium-sulfate type with variable TDS concentrations. TDS, sulfate, fluoride, iron, and manganese concentrations in the groundwater within the Cottonwood alluvium exceed the relevant groundwater use criteria listed Table 6.G-2. The use criteria in Table 6.G.2 are not enforceable standards with respect to groundwater and are included only as a reference for the suitability of the groundwater quality for domestic water supply and for livestock use. These use criteria are the mostly derived from the Navajo Nation surface water quality criteria for domestic water supply and for livestock watering use. The livestock watering criteria for TDS and sulfate were obtained from Lardy, G., C. Stoltenow, and R. Johnson (2008). Based on these relevant use criteria, the water in the alluvium of the mainstem of Cottonwood is a poor source of supply for livestock watering use. Fluoride concentrations often exceed the Navajo Nation surface water quality criteria for livestock use and sulfate concentrations exceed recommended criteria for livestock use (Table 6.G-2). Also, the alluvium is variably saturated and often will not yield sufficient water for sampling.

Two alluvial monitoring wells, PA-1 and PA-2, were installed in 1998 within the alluvium of Pinabete Arroyo at the locations shown in Exhibit 6.G-1. Table 6.G-3 summarizes the baseline water level readings and aquifer test results are summarized in Table 6.G-4. The estimated hydraulic conductivities for the Pinabete Arroyo alluvium of 51.3 ft per day (ft/day) (1.8×10^{-2} cm per second (cm/sec)) and 10.7 ft/day (3.8×10^{-3} cm/sec) are within the range expected for clean sand and are considerably higher than the bedrock values in the area. Well yields from the alluvium, however, are limited by a very low saturated thickness of about 5 ft or less.

Water quality analytical results from the baseline sampling of alluvial wells PA-1 and PA-2 are provided in Table 6.G-5 and Table 6.G-6, respectively. These results show the water quality to be a sodium-sulfate type with TDS concentrations ranging from 1,500 to 4,310 mg/L. Water within the alluvium is unsuitable for drinking water use due to TDS, sulfate, fluoride, iron, and manganese concentrations above drinking water criteria. The water is also a poor source of supply for livestock watering use. TDS, sulfate, and fluoride concentrations usually exceed relevant criteria for livestock use (Table 6.G-2).

Some information on the baseline water quality in the Chaco River Alluvium is provided in the well inventory included in Appendix 6E –Addendum 12-D-A of the PAP. The available water quality information from this well inventory show TDS concentrations ranging from 1,950 mg/l to 3,110 mg/l and sulfate concentrations ranging from 1,100 to 1,790 mg/l at wells located west of Areas II, III and IV at the Navajo Mine. Limited groundwater quality baseline data are also provided by Thorn (1993) for the Chaco River alluvium. The results show considerable variability in the alluvial water quality with TDS concentrations ranging from 742 to 11,900 mg/L, sulfate concentrations from 350 to 6,600 mg/L, and fluoride concentrations ranging from 0.4 to 1.7 mg/L.

6.G-3 Fruitland Coal Seams

Groundwater is also found in the coal units of the Fruitland Formation and in the PCS, which underlies the Fruitland Formation at the Navajo Mine site. The geologic strata within the permit and adjacent area dip gently to the east toward the center of the San Juan Basin at an angle of 1 to 2 degrees as depicted in the cross sections provided in Exhibit 6.G-1. Based on both regional and site-specific information, the Fruitland Formation and associated coal units, and the PCS are unsaturated or partially saturated near the outcrop of these units on the western side of the Navajo Mine permit area but become saturated to the east and down dip of the outcrop. The pre-mine groundwater in the Fruitland Formation throughout most of the BNCC coal lease will not support beneficial use because of the very low well yields and poor water quality. There are no known water supply wells completed in the Fruitland Formation within or adjacent to the BNCC coal lease.

Based on baseline information obtained from water level elevations measured in the wells and piezometers, the general groundwater flow directions in the Fruitland Formation within Areas III, IV and V of the BNCC coal lease are vertically downward through the interbedded shale and coal units of the Fruitland Formation and into the PCS and laterally within individual coal seams toward the north-northeast with some localized flow toward the topographic lows along Cottonwood and Pinabete Arroyos. Direct recharge rates measured by chloride mass balance methods on undisturbed areas at the Navajo Mine ranged from 0.002 to 0.09 in/yr (Stone 1987). The highest recharge rate of 0.09 in/yr was for valley terraces while the lowest recharge rate of 0.002 in/yr was for badland areas. Recharge from upland flats averaged 0.03 in/yr. Recharge is expected to be higher from saturated alluvium and surface impoundments. Although Stone’s research (1986 and 1987) did not include recharge estimates for surface impoundments, it does provide an estimate of an average recharge rate of 0.16 in/yr from depressions within reclaimed mine areas at the Navajo Mine.

Based on the previous mining experience at the Navajo Mine, the coals, the overburden, and the interburden in the Fruitland Formation are not expected to yield much water during mining. The mine pit has remained dry except on rare occasions when surface flows are captured. Groundwater seeps are rarely observed along the highwall as any groundwater in the Fruitland overburden and coals is consumed by evaporation along the highwall. The few seeps that have been observed during mining were at locations within Area I where the highwall was near Navajo Agricultural Products Industry (NAPI) irrigation plots. NAPI irrigation plots do not occur within the drainages associated with proposed Area IV mining, although Cottonwood Arroyo does receive direct discharges of water from irrigation canals. The direct discharges occur when an over supply of water in the canal is released directly to the stream channel. Direct discharge is highly variable, occurs quickly, and can last up to 12 hours. However, usually there is no flow in Cottonwood Arroyo and it retains the characteristics of an ephemeral stream

One conceptualization of the hydrogeology of the Navajo Mine site is to consider the Fruitland Formation as a single hydrogeologic unit. The single hydrogeologic unit approach was previously proposed by Billings and Associates (Appendix 6.D) for modeling groundwater at the Navajo Mine because of the complexity of the individual coal seams, which often split or pinch out. This conceptualization has been used for predicting steady-state post mining flow in the Fruitland Formation from the Navajo Mine to the discharge locations along the subcrop with the San Juan River alluvium. This conceptualization may be best for regional modeling and is the appropriate conceptualization when baseline hydrogeologic information does not exist to calibrate a more complex hydrogeologic model.

However, given the extensive baseline hydrogologic information that was available within areas IV and V of the BNCC lease, a conceptual hydrogeologic model and the numerical groundwater model that delineates the coal beds as distinct hydrogeologic units was developed to assess the baseline hydrogeologic conditions and to simulate the effects of mining within Area IV North. This conceptualization supports the calibration of a numerical model because the potentiometric information is developed from monitoring wells and piezometers completed in specific coal units. This conceptualization is also better for evaluating local influences and the potential changes in vertical and horizontal groundwater flows that may occur as a result of mining and reclamation.

The potentiometric elevations in the specific coal units decline with depth within Areas III, IV and V of the BNCC lease as shown in Exhibit 6.G-1, indicating a vertical downward component of flow through the Fruitland Formation. One of the primary hydrogeologic changes to occur as a result of mining is the removal of the coals, interbedded shales, and sandstone strata, thus resulting in more homogeneous and isotropic conditions within the mine backfill. This change is expected to result in a steady-state post-mining water table that is lower than pre-mining but steady-state potentiometric elevations at the base of the mine backfill that are higher than the potentiometric elevations that occurred in the lowest coal seam prior to mining. The result of this change would be an increase in vertical flow from the mine backfill into the PCS under steady-state post-mining conditions relative to the vertical flow from the Fruitland Formation to the PCS prior to mining.

However, these changes would not be expected within Area I. The pre-mine vertical downward gradient may not have occurred in the Fruitland Formation within Area I because of its closer proximity to the San Juan River, a location for regional groundwater discharge where upward gradients would be expected. Also, Morgan Lake has increased potentiometric elevations in the PCS, which further limits the potential for downward flow into the PCS from the Fruitland Formation.

The PCS, the first hydrogeologic unit below the Fruitland Formation, has been included in the groundwater flow model. The top of the Lewis Shale, the first hydrogeologic unit below the PCS, has been included as the base of the model domain. The delineation of these hydrogeologic units within the model domain was created from the extensive geologic and groundwater information developed for Areas IV and V. Information was also obtained from a variety of sources to help delineate the hydrogeologic units and define groundwater conditions for the portions of the model domain that are beyond the limits of Areas IV and V. Norwest Corporation (2011) provides a description of the hydrogeologic model that was developed to characterize the baseline hydrogeology and to support the probable hydrologic consequences assessment.

Baseline potentiometric elevations measured in the wells and in the VWPs completed in specific coal seams within Areas IV and V are summarized in Table 6.G-7. The potentiometric surface for the No. 3 coal seam is provided in Exhibit 6.G-2. This potentiometric surface was constructed from the baseline potentiometric elevations for the No. 3 coal seam presented in Table 6.G-7 and the July 1989 baseline potentiometric elevations measured in the No. 3 coal wells located within Area III. The modeled baseline potentiometric surface for the No. 3 coal in Figure 6.G-2 was also used to estimate the potentiometric contours beyond the limits of the monitoring data. The potentiometric gradient in the No. 3 coal indicates groundwater flow components toward the north-northeast with local gradients toward Pinabete Arroyo and Cottonwood Arroyo. The lower coal seams pinch out and do not extend north of Area III. The groundwater moving along the potentiometric gradients to the northeast flows through the undifferentiated Fruitland Formation into either the upper coal units or into the underlying PCS.

Potentiometric gradients in the other coal seams within Areas III, IV, and V of the BNCC coal lease are expected to be generally toward the northeast, similar to the gradients shown for No. 3 coal. However, the upper coal seams (No. 6, No. 7, and No. 8) outcrop to a greater extent within the valleys of Pinabete Arroyo, No Name Arroyo, and Cottonwood Arroyo within the BNCC coal lease. The groundwater associated with these upper coal seams is expected to show greater local influence from the topographic lower elevations along the arroyos. The baseline hydrogeologic model generated to support the probable hydrologic consequences assessment simulated local potentiometric gradients toward the topographic lows along Pinabete Arroyo, No Name Arroyo, and Cottonwood Arroyo in all of the Fruitland coal units. The local influence of topography on potentiometric gradients was greatest for the shallowest coal, the No. 8 seam (Norwest Corporation, 2011). Field observations of salt deposits and enhanced vegetation production also indicate that local discharge may occur from the No. 8 coal at the coal outcrop along Pinabete Arroyo. Baseline groundwater model simulations in Figure 6.G-3 and potentiometric elevations at wells KF-2007-01, KF84-22A, and KF83-10A were used to prepare the potentiometric surface of the No. 8 coal seam that is provided in Exhibit 6.G-3.

A displacement (slug) test was performed at well KF-98-02 and bailed recovery tests were conducted at wells KF-98-03 and KF-98-04 to determine transmissivity and hydraulic conductivity in the No. 3 coal seam within Area IV South. The test results are summarized in Table 6.G-8 and show very low hydraulic conductivity values for the No. 3 coal consistent with the low hydraulic conductivity values reported in Table 6-1 for the No. 2, No. 3, and No. 4-6 coal seam wells located within Area IV North. A pumping test of the No. 8 coal seam well KF2007-01 was also performed and interpreted using the Papadopulos-Cooper method as shown in Table 6.G-8. The higher hydraulic conductivity for the No. 8 coal seam relative to the No. 3 seam is consistent with the results in Table 6-1, which show higher hydraulic conductivities for the No. 7 and No. 8 coal units relative to the lower coal units.

In a separate set of tests, the transmissivity and hydraulic conductivity values calculated from the observation well response during a pumping test of the No. 8 coal seam well, G-20, located at the San Juan Mine were 0.017 ft^2/day and 0.001 ft/day (3.5×10^{-7} cm/sec), respectively (San Juan Coal Company, 2009). These results for the hydraulic conductivity from G-20 are lower than the values from well tests at Navajo Mine. However, the observation well response from well G-20 pumping test is useful because it provides a reliable estimate for the storage coefficient (4.2×10^{-4}) associated with the No. 8 coal seam.

Water quality monitoring data from Fruitland Formation coal wells at the Navajo Mine and BNCC coal lease monitoring locations show that baseline groundwater in the coals is very saline. Table 6.G-9 provides a summary of the baseline water quality obtained from coal wells located within Areas II, III, and IV at the BNCC coal lease. This table provides median baseline concentrations measured at the coal wells along with the number of baseline analyses obtained for each constituent at each well. Given the variability in some of the analytical results, the median provides a good representation of baseline water quality at each well location. The median, unlike the mean, is not biased by an anomalous value resulting from analytical or transcription errors or by a sample that may not be representative due to sampling method or impact by drilling fluids or annular grout seal.

The TDS concentrations in Table 6.G-9 for the coal water at the Navajo Mine monitoring locations relevant criteria for both drinking water and livestock use (Table 6.G-2). The chloride concentrations also relevant criteria for both drinking water and livestock uses in most of the wells. Fluoride concentrations are quite variable but the median values in several of the wells exceed the relevant criteria for both drinking water and livestock uses. Sulfate is also quite variable among coal wells with concentrations above relevant drinking water and livestock use criteria in the shallow coal wells near the outcrop but very low sulfate concentrations in the coal water in the deeper coal units and down dip of the outcrop. The low sulfate in these deeper coals is due to apparent sulfate reduction in the groundwater.

Groundwater monitoring results in Table 6.G-9 show that sodium is the dominant cation in the coal water and that bicarbonate and chloride are typically the dominant anions except for the relatively high sulfate in the shallow coals near the outcrop. The TDS concentrations in the coal units at the Navajo Mine typically increase from south to north and from shallow to deep. Furthermore, baseline TDS concentrations in excess of 40,000 mg/L have been reported in Table 6-2 of Navajo Mine Permit Application for the Fruitland coal monitoring wells SJKF84#2 and SJKF84#3 installed in the No. 8 coal northeast of the Navajo Mine as shown in Exhibit 6-6 of the Navajo Mine Permit Application.

Groundwater chemistry can change or evolve along its flow path from the recharge area to the discharge area. Precipitation is low in TDS, is naturally weakly acidic, and contains bicarbonate due to the solution of carbon dioxide in the air. In this portion of the San Juan Basin, the precipitation reaching the ground is immediately neutralized and acquires sodium, sulfate, and other ions. Water that has only a short residence time in the ground is still typically high in TDS concentrations, with sodium, sulfate, and bicarbonate the dominant ions as indicated by both the surface water and alluvial groundwater samples. Calcium is also present due to dissolution of calcium carbonate, but at concentrations that are considerably lower than sodium. Chloride concentrations in precipitation are low. Chloride concentrations in groundwater increase due to evapotranspiration and are typically lower in groundwater in the alluvium and in shallow bedrock near recharge areas. As groundwater migrates through the saturated zones it is no longer in contact with atmospheric carbon dioxide and its capacity to dissolve carbonates diminishes. The chemistry of the groundwater continues to evolve as other soluble minerals dissolve and cation exchange processes reduce the proportion of calcium and increase the proportion of sodium in solution. Sulfate reduction also occurs when groundwater transitions from oxidizing to reducing conditions, particularly within the coal units.

6.G-4 Pictured Cliffs Sandstone

The PCS is a well-cemented, low-permeability, marine sand and is the first water-bearing unit below the Fruitland Formation. Based on the geologic information presented in Section 5 of the Navajo Mine Permit, the PCS is approximately 110 to 120 ft thick and follows the structure of the Fruitland Formation, dipping to the east at approximately 2 degrees, although the structure varies locally. The PCS conformably overlies the Lewis Shale, with the contact marked by a zone of interbedded sandstones and mudstones in the lower part of the PCS (Stone et al. 1983). It outcrops just west of the mine lease and east of the Chaco River. The PCS is a marginal water resource due to low permeability, poor water quality, gas production, and low yields (Stone et al. 1983). The PCS is also a natural gas reservoir in the San Juan Basin. Stone et al. (1983) state that the PCS cannot be considered a major aquifer and it is important only because it is the water-bearing horizon immediately underlying the coals in the Fruitland Formation.

Well KPC-98-01 was installed in 1998 near the PCS outcrop at the location shown in Exhibit 6.G-1. In 2007, wells KPC2007-01, KPC2007-02, and KPC2007-03 were completed in the PCS at locations around the perimeter of Area IV South (Exhibit 6.G-1). VWPs were installed in the PCS at four of the five VWP locations as shown on Exhibit 6.G-1. A VWP was not installed in the PCS at the VWP2007-03 location because monitoring well KPC2007-02 was installed in the PCS at this location. Potentiometric elevations measured at the PCS wells and the VWPs are summarized in Table 6.G-10.

The water levels measured in the PCS well KPC2007-01 at the VWP2007-01 location show elevations in the PCS monitoring well that are consistently about 6 feet lower than the potentiometric elevation measured in the PCS at the VWP. The VWP in the PCS at this location is installed at the top of the PCS, while the well screen and filter pack extends through about 75 ft of the PCS. The difference between the two measurements suggests that hydrostatic heads are higher at the top of the PCS at this location and decline with depth. Thus, downward gradients are believed to continue through the PCS at this location.

Historical water level data are also available for six PCS wells that were completed within or adjacent to BNCC lease Areas IV and V during the mid-1970s. Data from these well are included in a report by Science Application, Inc. (1979) that was prepared for a proposed coal gasification project. These PCS monitoring wells are designated as the GM wells with water elevations shown on Exhibit 6.G-4. These PCS monitoring wells and piezometers were plugged and abandoned in 1994.

The modeled baseline potentiometric surface for the PCS in Figure 6.G-1 together with the baseline potentiometric elevations from the PCS wells and VWPs were used to prepare the PCS potentiometric surface provided in Exhibit 6.G-4. The measurements of the baseline potentiometric elevations for the abandoned GM wells were obtained in June 1989. The potentiometric surface for the PCS shows overall gradients to the north. The highest potentiometric elevations for the PCS shown in Exhibit 6.G-4 correspond with a structural high in the PCS located within the southeast portion of Area V of the BNCC coal lease. There are also local gradients toward the topographic lows along No Name Arroyo, Pinabete Arroyo and Cottonwood Arroyo.

Water yields are quite low from these PCS monitoring wells completed around BNCC lease Area IV South. Two of the PCS wells were quickly pumped or bailed dry during conventional sampling. The yield from one of the PCS wells was sufficient to sustain a rate of about 0.4 gallons per minute (gpm) during a constant rate pumping test. The fourth PCS monitoring well was pumped dry after about 140 minutes during a constant-rate pumping test at a rate of about 1 gpm.

An aquifer test was also conducted in 1975 at well T4-1 installed in the PCS near the western side of the Navajo Mine lease boundary as shown in Exhibit 6.G-4. The drawdown and recovery measurements were recorded at the pumped well and at observation well GM30A, located 55.8 ft from the pumping well, and at observation well T4-2 located 12.5 ft from the pumping well (Science Application Inc. 1979). The results of this aquifer test and those performed at the PCS monitoring wells installed within or adjacent to Area IV South are summarized on Table 6.G-11.

Water quality analytical results from the baseline sampling of KPC-98-01 are provided in Table 6.G-12. The initial sample collected from this well in 1998 showed some influence from drilling fluids based on elevated pH and nitrate in the well sample results (Table 6.G-12). It is suspected that the well was not fully developed due to low permeability and limited saturation. Sampling results starting in 2007 are more consistent and representative of baseline conditions within the PCS at this location. Based on the recent samples, the PCS groundwater at this location is a sodium-sulfate type with TDS concentrations slightly above 6,000 mg/L.

The baseline water quality results from PCS well KPC2007-01 are summarized in Table 6.G-13. The PCS groundwater at this location is similar to the groundwater at well KPC-98-01 with TDS concentrations slightly below 6,000 mg/l. Baseline water quality information was also collected during the mid-1970s from PCS wells GM-19, GM-20, GM-30A and GM21 located within or in close proximity to the BNCC coal lease as shown in Exhibit 6.G-1. Water quality data from these wells are summarized in Tables 6.G-14 through 6.G-17. Baseline water quality data for these PCS monitoring wells indicate a sodium-sulfate type with TDS concentrations between 5,000 and 9,000 mg/l. The water quality results are consistent with the results from wells KPC-98-01 and KPC2007-01, although the initial well samples from a number of the PCS wells is suspect due to either poor ion balance or insufficient well development.

In summary, groundwater quality data from monitoring wells located within and adjacent to the Navajo Mine indicate that the groundwater in the PCS has high TDS concentrations, ranging from 5,000 mg/L to over 9,000 mg/L. Sulfate is the dominant anion, although the concentrations of chloride and bicarbonate are also relatively high. Sodium is the dominant cation. Magnesium and calcium concentrations are quite low and are typically less than the potassium concentrations. Generally, water quality changes are observed in the first few samples obtained from PCS monitoring wells, apparently due to the difficulty in developing these low-yield wells. Thus, samples obtained after the initial two samples are believed to provide a better representation of baseline conditions.

The groundwater in the PCS groundwater within Areas IV and V of the BNCC coal lease is unsuitable for either domestic or livestock use. The concentrations of TDS, sulfate, chloride, and boron in the PCS wells are considerably higher than the domestic use criteria provided in Table 6.G-2. The TDS and sulfate concentrations in the PCS are also considerably higher than the livestock use criteria provided in Table 6.G-2. The low permeability and low yield of the PCS also limits the potential for groundwater use from the PCS. There are no known water supply wells completed in the PCS within or adjacent to Navajo Mine Permit Area.

6.G-5 Hydrologic Model

Conceptual and numerical groundwater models are useful to support the interpretation of baseline hydrogeologic information. Furthermore, conceptual or numerical groundwater models are required for the predictive evaluations needed to prepare a probable hydrologic consequence (PHC) assessment of proposed mining and reclamation activities. Groundwater models used for a PHC assessment can range from conceptual depictions, to simple empirical equations, to complex numerical computer simulations of groundwater flow and chemistry.

Site-specific data or data representative of the site conditions are needed to apply groundwater models. Numerical groundwater flow models can help develop a better understanding of the hydrogeologic system, including the groundwater flow relationships between hydrogeologic units and between surface water and groundwater. Extrapolation of data from adjacent or nearby areas or using typical values for parameters from similar hydrogeologic environments is often used in developing numerical flow models. Model calibration can also serve to revise the conceptual model of the groundwater system and provide a better assessment of the properties of hydrogeologic units on a regional scale that cannot be obtained solely from local pumping testing results.

The first step in developing a groundwater model is to establish the objectives of the study. There are three primary objectives for the development of a groundwater model for Area IV North mine permit revision application:

- To provide a better understanding of the baseline groundwater flow systems within and adjacent to the proposed mine area.
- To predict the steady state groundwater flow system that is expected to occur long after mining and reclamation activities have been completed in the area. In particular, this evaluation will need to estimate the expected level of saturation within the mine backfill and the groundwater flow rates and directions into and from the mine backfill.

- To predict the transient groundwater changes that are expected during and after mining. In particular, these evaluations will assess the extent of drawdown in the Fruitland coals and the PCS, and the approximate time frames for recovery to steady state conditions following mining.

Potentiometric elevations in the monitored coal units and in the underlying PCS are plotted in the hydrogeologic sections in Exhibit 6.G-1, to depict vertical gradients. Quarterly monitoring performed on many of these wells and VWPs show no seasonal changes but occasional fluctuation in some wells due to slow recovery following bailing, purging and sampling. Results show downward potentiometric gradients through the Fruitland formation. Generally the gradients are downward from the Fruitland to the PCS except at locations VWP2007-02 and VWP2007-05. The slightly higher potentiometric elevation in the PCS at these locations indicates a slight upward gradient from the PCS to the No. 2 and 3 coal units of the Fruitland Formation.

6.G-6 Numerical Groundwater Model

A multilayer, numerical, groundwater flow model has been developed to model the groundwater flow systems within and adjacent to Navajo Mine Area IV. Norwest Corporation (2011) provides a detailed description of the numerical groundwater flow model. This numerical model is based on the conceptual model of the hydrogeology of the Fruitland coals, the PCS and the alluvial groundwater systems within and adjacent to Navajo Mine Area IV. A conceptual groundwater model is a complex hypothesis of the characteristics and functions of a hydrogeologic system, including recharge and discharge relationships, groundwater flow within and between hydrogeologic units, and the expected properties of these hydrogeologic units. An essential part of the both the conceptual and numerical models is a graphical representation of the horizontal and vertical boundaries of the hydrogeologic system (the model domain) and the delineation of the hydrogeologic units within the model domain that are believed to have the primary controlling influence on groundwater flows. Another element of the conceptual model is to define, to the extent possible, the properties of these hydrogeologic units, including the thickness, hydraulic conductivities, and storage characteristics across the model domain. The conceptual model also includes the hydrogeologist’s understanding of spatial relationships between and approximate rates of recharge and discharge, including the groundwater inflows and outflows from the model domain.

The delineation of the hydrogeologic units within and adjacent to Navajo Mine Area IV was based on the extensive geologic and groundwater information obtained from a variety of sources, including the baseline information presented in this Appendix. The multilayer groundwater model was calibrated to obtain a good match with potentiometric surfaces and water levels established from the baseline groundwater information while maintaining consistency with the site-specific recharge estimates from Stone (1986) and the range of hydraulic conductivities associated with each hydrogeologic unit. During model calibration, hydraulic conductivities were applied only for the entire hydrogeologic unit and not spatially within a unit. Without a consistent geologic basis, spatial adjustments in hydrologic conductivities would lead to over-parameterization of the model to match modeled potentiometric levels with observed values. Although some of the differences between the modeled and observed potentiometric levels may be associated with spatial variation in hydrogeologic properties within a hydrogeologic unit, the chosen method for model calibration allows for the overall groundwater flow within each hydrogeologic unit and between units to be represented by the calibrated groundwater model.

Generally, a shale zone such as the Lewis Shale would be considered as an impermeable boundary. However, given the low recharge rates at the Navajo Mine site, the overall low permeability of the Fruitland Formation shales and coals, and the relatively low permeability of the PCS, the flow conditions at the boundary between the PCS and Lewis Shale were found to be significant for calibrating the groundwater flow model. Providing for downward flow from the PCS into the Lewis Shale was required in order to reach an adequate calibration with recharge rates consistent with the measurements from Stone (1987). Downward flow and downward gradients are also indicated by hydrogeologic studies and tests of the Lewis Shale and the PCS immediately west of Area V of the Navajo Mine lease (Science Application, Inc. 1979). Also, as discussed in Section 6.G-4, the water levels measured in the PCS well KPC2007-01 and in the PCS VWP at the same location show that downward gradients continue through the PCS at this location.

Table 6.G-18 shows the relationship between the modeled recharge rates and the measurements by Stone (1987). Outside of the alluvial valleys, recharge rates were adjusted by slope within the range of estimates from Stone (1987) for badland areas and for upland flats. The modeled potentiometric surface for the PCS, the No. 3 coal seam, and the No. 8 coal seam are provided in Figure 6.G-1, Figure 6.G-2, and Figure 6.G-3, respectively. These results are consistent with the baseline potentiometric elevations obtained from monitoring wells completed in these hydrogeologic units. However, the modeled potentiometric surfaces extend beyond the limits that could be depicted from well measurements. These potentiometric surfaces and flow patterns are consistent with the conceptual model and all the geologic and hydrogeologic information and the specified boundary conditions.

The results in Figure 6.G-1 show a component of groundwater flow from the PCS to the topographic lows along the west side of the model domain in the valleys of Brimhall Wash, No Name Arroyo, Pinabete Arroyo, and Cottonwood Arroyo. The results for the No. 3 coal seam in Figure 6.G-2 also show a component of groundwater flow to the topographic lows along the west side of the model domain in the valleys of No Name Arroyo, Pinabete Arroyo, and Cottonwood Arroyo. The No. 3 coal seam is not present over a portion of the Brimhall Wash drainage or along the western portion of the model domain. Also, the No 3 coal seam is unsaturated in areas along the western outcrop and remains unsaturated in the modeled potentiometric surface as indicated in Figure 6.G-2. A similar pattern is observed in Figure 6.G-3 for the No. 8 coal seam, although this coal is not present over a large portion of the Brimhall drainage or within a large portion of the No Name, Pinabete, and Cottonwood valleys within the BNCC coal lease. In addition to the flow toward the topographic lows, there is a component of flow down dip to the northeast. Portions of the No. 8 coal seam near the western outcrop are unsaturated. Not shown in these figures for individual hydrogeologic units are the overall downward gradients and downward flow between units. In fact, the model predicts perched groundwater conditions in the shallower coals along the western portion of the lease area as depicted by the north-south section in Figure 6.G-4.

Figure 6.G-1. Modeled Potentiometric Surface for the PCS

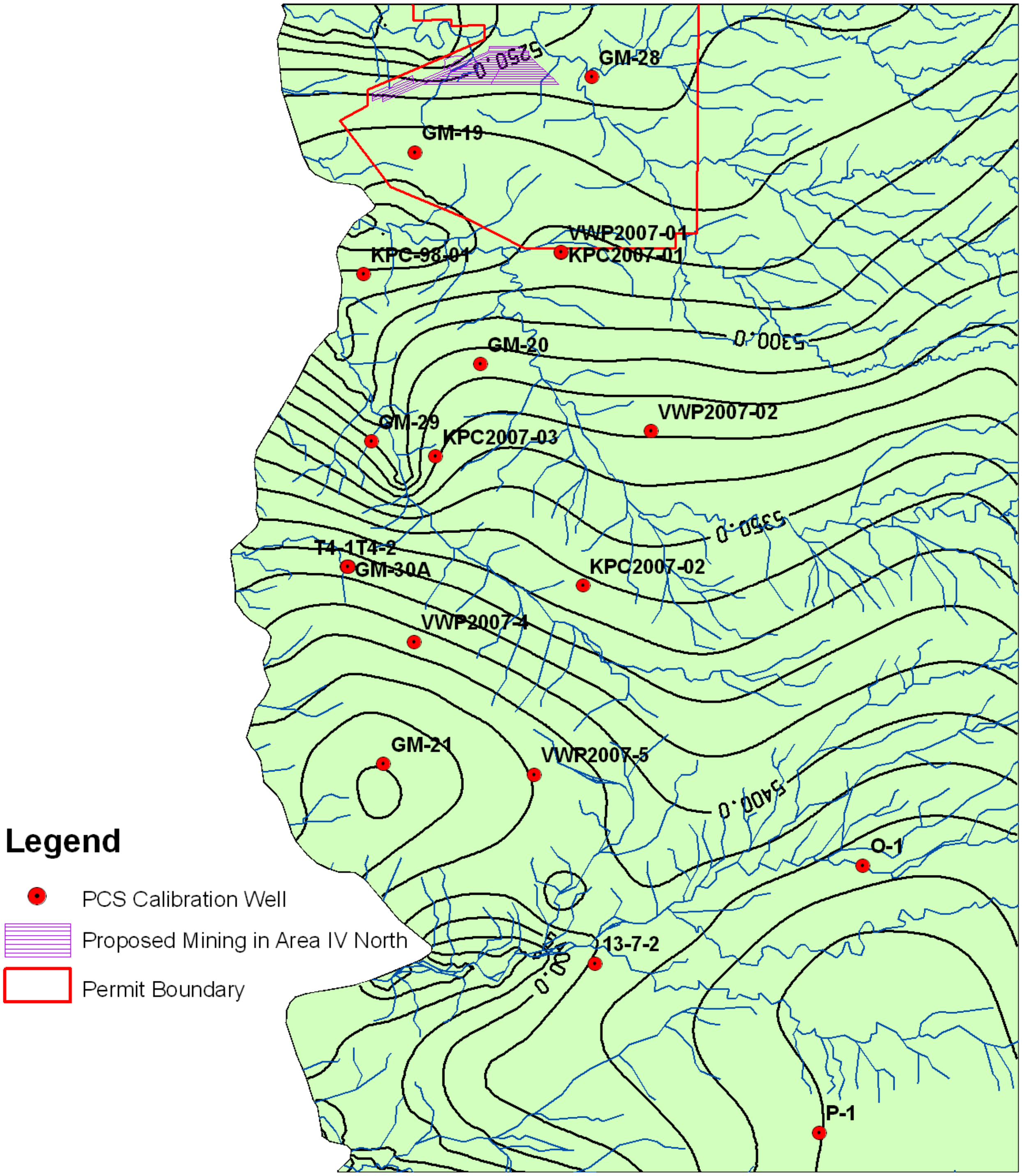


Figure 6.G-2. Modeled Potentiometric Surface for the No.3 Coal

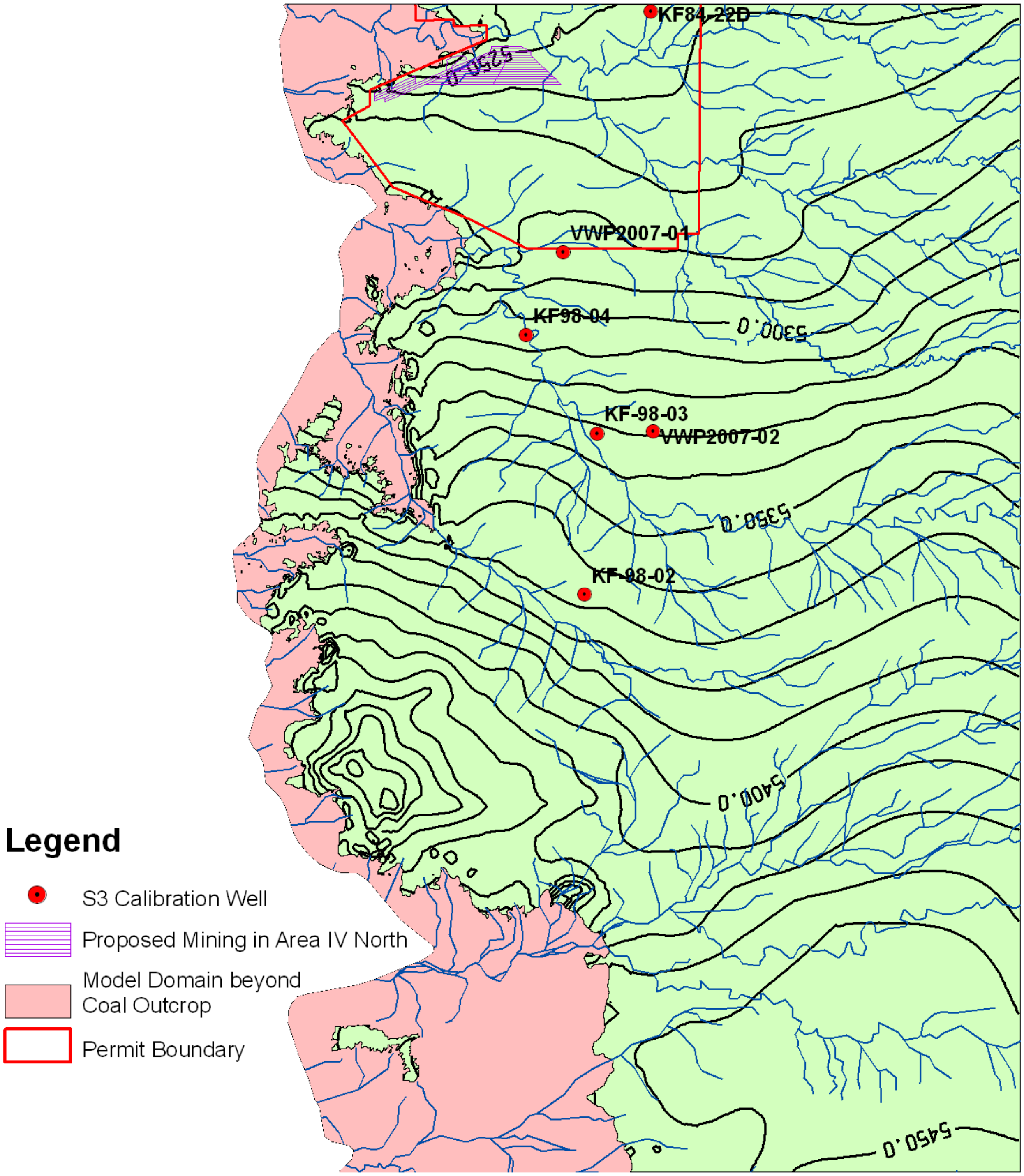


Figure 6.G-3. Modeled Potentiometric Surface for the No. 8 Coal

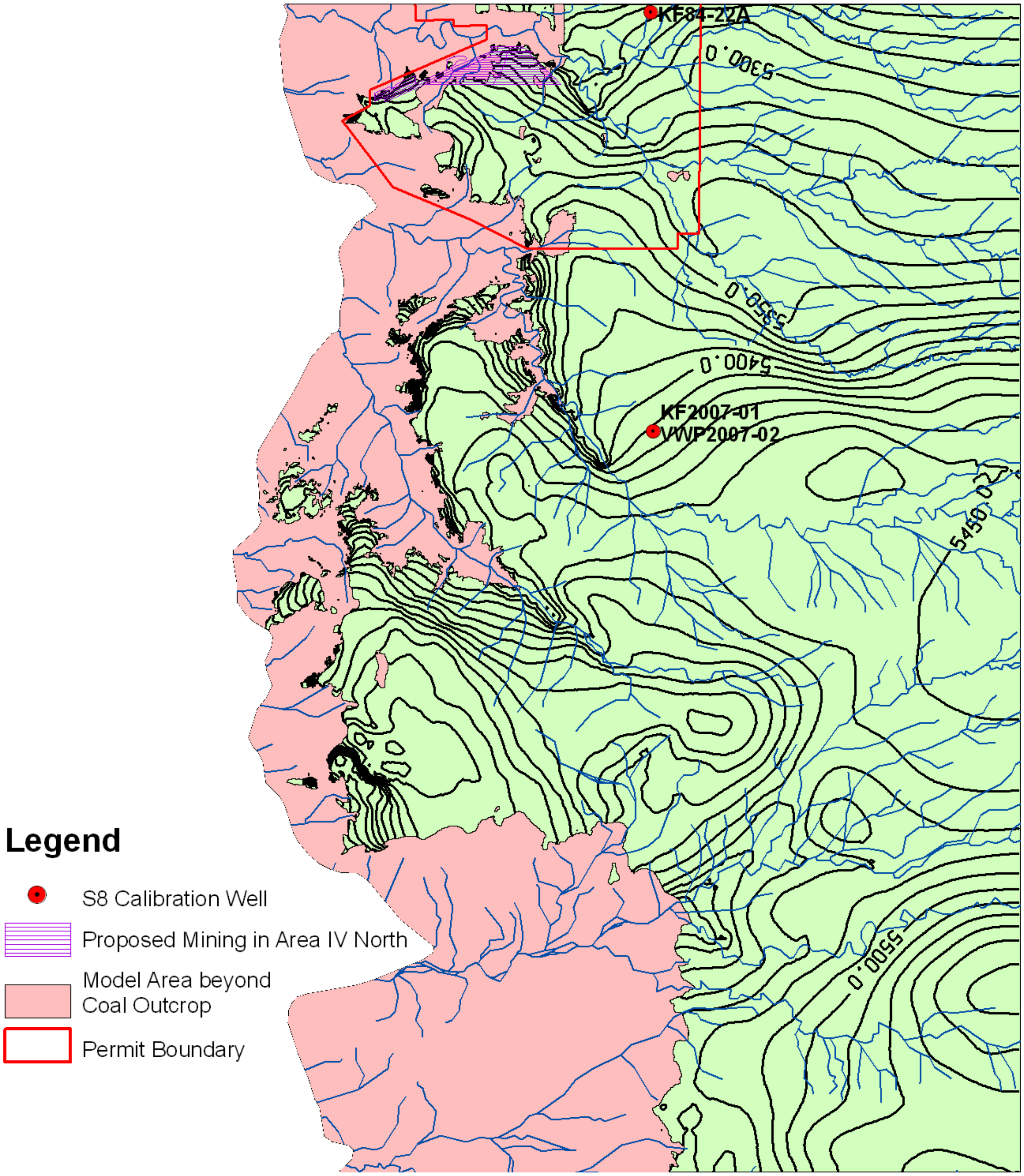
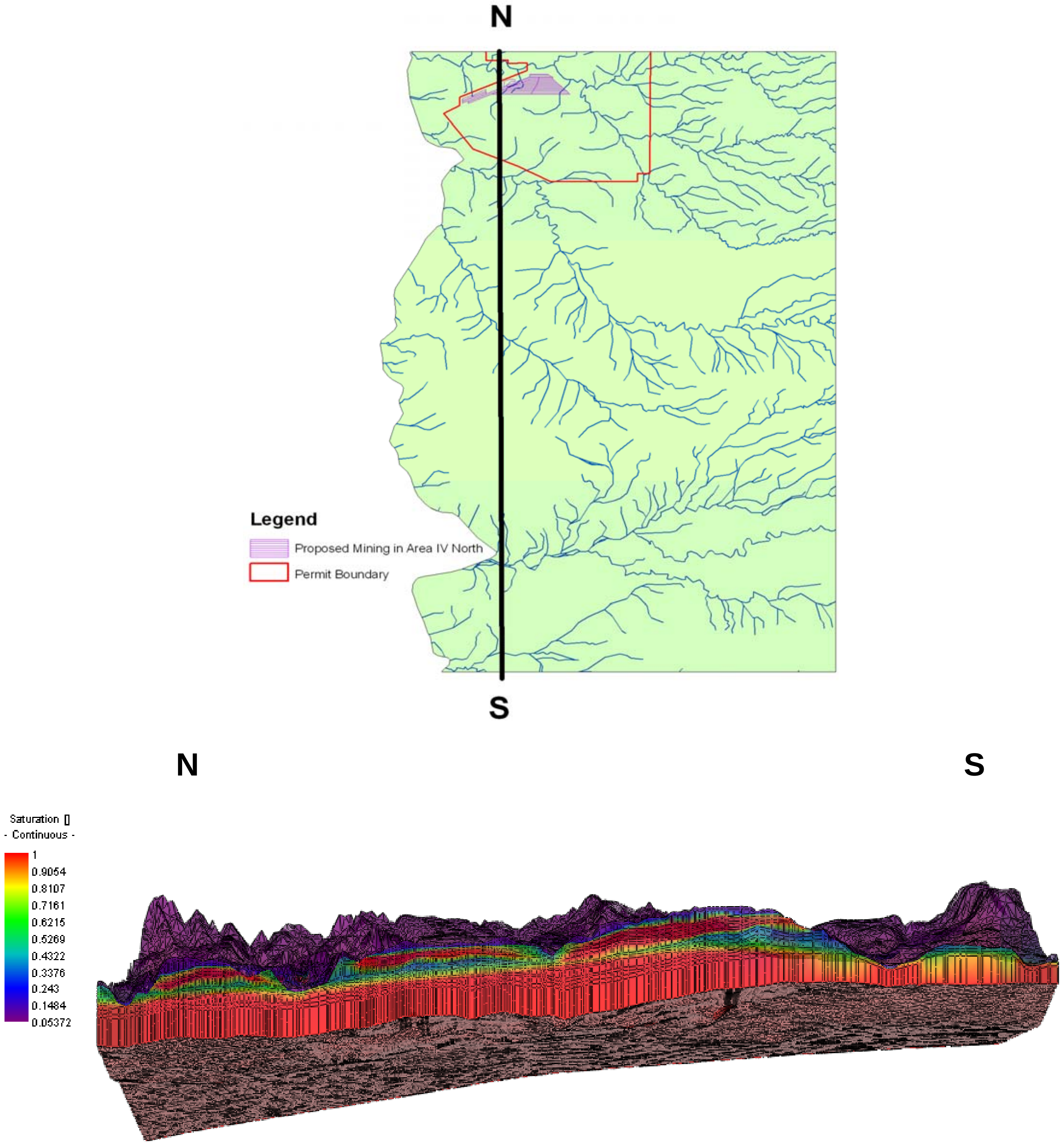


Figure 6.G-4. Modeled Saturation for a N-S Section



The calibrated numerical model helps confirm the conceptual model. The numerical model is well constrained and consistent with the recharge rates measured by Stone (1987) and with the hydraulic conductivities and heads measured within the various hydrogeologic units in the model domain.

6.G-7 References

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Appendix 6.G Tables

Appendix 6.G Exhibits

Table 6.G-2. Water Quality Criteria

(Water Quality Criteria are presented from Surface Water Standards for Comparison Purposes)

Parameter (units)	Livestock Watering Criteria for Surface Water by 2007 Navajo Nation Standards[1]	Domestic Water Supply Criteria for Surface Water by 2007 Navajo Nation Standards[1]	EPA Secondary Drinking Water Standards[2]
Arsenic (mg/L)	0.2	0.01	
Barium (mg/L)	-	1	
Boron (mg/L)	5	0.63	
Cadmium (mg/L)	0.05	0.005	
Chloride (mg/L)	-		250
Chromium (mg/L)	1	0.1	
Copper (mg/L)	0.5(D)	1.3	1
Fluoride (mg/L)	-	4	2
Total iron (mg/L)	-		0.3
Lead (mg/L)	0.1	0.015	
Total manganese (mg/L)	-		0.05
Mercury (mg/L)	-	0.002	
Nitrate (mg/L-N)	-	10	
pH (su)	6.5-9.0	5.0-9.0	6.5-8.5
Potassium (mg/L)			
Radium-226 (pCi/L)	30**	5**	
Radium-228 (pCi/L)	30**	5**	
Selenium (mg/L$^{)}$	0.05	0.05	
Silver (mg/L)		0.035	0.1
Sulfate (mg/L)	1000*		250
Total dissolved solids (TDS) (mg/L)	3000*		500
Uranium (mg/L)		0.03	
Zinc (mg/L)	25	2.1	5

[1] Navajo Nation Environmental Protection Agency Water Quality Program, 2008, Navajo Nation Surface Water Quality Standards 2007, passed by Navajo Nation Resources Committee on May 13, 2008

[2] http://water.epa.gov/drink/contaminants/secondarystandards.cfm

* Although there are no Navajo Nation livestock watering criteria for TDS and sulfate, TDS concentrations above 3,000 may adversely affect growing/young livestock and waters with sulfate concentrations above 1,000 mg/l are not recommended for livestock use (Lardy, G., C. Stoltenow, and R. Johnson, 2008)

** Ra-226 + Ra-228

mg/L - milligram per liter