



August 12, 1993

Pamela Grubaugh-Littig
Division of Oil, Gas and Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

RECEIVED

AUG 25 1993

DIVISION OF
OIL, GAS & MINING

Copy AM, Susan, Henry,
Hugh, Jess

RE: **1993 TRAIL MOUNTAIN EXPLORATION DRILLING AMENDMENT
DEFICIENCIES, PACIFICORP, TRAIL MOUNTAIN MINE, ACT/015/009,
EMERY COUNTY, UTAH**

#2

Dear Ms. Grubaugh-Littig:

PacifiCorp has responded to the deficiency list that was faxed from your office on July 16, 1993 as follows:

- 1) *The area disturbed by the exploration must be shown on all relevant maps as part of the disturbed area (see R645-301-521.163).*

A review of the pertinent maps of the Trail Mountain MRP revealed that the only relevant map was the Surface Facilities Map, 3-1. This map, due to its size and scale, does not encompass the whole permit area; therefore, a new map was generated that shows the exploration disturbance relative to the permit area, per discussion with Jess Kelley and Hugh Klein of the Division. Please find enclosed seven (7) copies of Drawing TMS1474B, Trail Mountain Exploration Disturbance Map 1993 Surface Drilling Holes TMTN-9 Through TMTN-15, to be included in the 1993 Drilling Application.

- 2) *The permittee has calculated the cost of reclaiming the additional disturbed area, but still must either bond for that cost separately or else increase the existing bond to cover it (see R645-301-820.120).*

The existing bond in the Trail Mountain MRP has been increased sufficiently to cover the increase from exploration disturbance. Seven (7) copies of the Bonding Information will be submitted at a later date to be included in the 1993 Drilling Application as Attachment 7.

Please also find enclosed seven (7) copies of the List of Attachments revised 8/10/93 to show Attachment 7.

- 3) ***The plan describes reclamation of the roads, pads and other facilities, but contains no provision for reclamation of the abandoned drill holes themselves. Upon completion of down-hole procedures, all drill holes must be completely filled with cement, in accordance with the circular "Bureau of Land Management Coal Exploration Drilling Stipulations Inside the Permit Area" (see May 28, 1993 letter from US Bureau of Land Management to the Division). The cost of reclaiming the drill holes must also be included in the reclamation cost estimate and in the reclamation bond.***

The cost associated with sealing the holes has been calculated and is enclosed for replacement of Attachment 5 in the 1993 Trail Mountain Drilling Plan. Please find enclosed seven (7) copies of Attachment 5.

- 4) ***The plan must contain detailed information regarding treatment of disturbed area runoff from the drill pads, erosional control off the access roads, reclamation hydrology and updated hydrology maps showing this information.***

Treatment of the drill pads will be by use of a berm located at the perimeter of the pad to contain runoff as needed.

Erosion control off the access roads will be by use of silt fence for the areas that indicate erosion is occurring.

Reclamation hydrologic protection will be accomplished by the surrounding vegetation serving as a vegetative filter. As a secondary backup, the areas have several contour furrows that are used for water and sediment retention. These contour furrows were constructed in the 1980's in a watershed project on Trail Mountain by the USFS.

A map that shows the areas of disturbance has been generated and is referenced in Item #1, per discussion with Jess Kelley and Hugh Klein of the Division. Please find enclosed seven (7) copies of Pages 3, 5, 9 and 9.1 of the 1993 Drilling Application.

- 5) ***The plan states that the exploration drilling will require approximately 0.75 acre-feet of water and that this water will be obtained from springs belonging to the Cottonwood Creek Consolidation Irrigation Company. There is however, no indication that the operator has reached an actual agreement with the irrigation company to obtain this water from it's springs.***

The confirmation of the approved use of the spring has been obtained from the Division of Water Rights and is to be enclosed as part of Attachment 6 in the 1993 Trail Mountain Drilling Plan. Please find enclosed seven (7) copies of the approval letter (Attachment 6).

- 6) ***The plan must include vegetation data both on the reference area and on the area to be disturbed.***

A survey is being conducted by Mt. Nebo Scientific and will be submitted upon completion.

- 7) ***The plan must set forth the vegetation success standards to be reached in reclamation.***

Standards will be determined and set from the survey from Mt. Nebo Scientific.

- 8) ***The plan must address interim vegetation in the event that exploration is not completed before winter.***

Interim vegetation is not planned. Once exploration drilling is completed at a drill site, it is put into final reclamation. Care will be taken to coordinate drill holes and reclamation activities to limit the amount of disturbed area before final reclamation. Even if the onset of winter occurs before final reclamation is completed, no growth would from interim reclamation occur before spring when final reclamation would be resumed. This information is included on page 9.1 and addressed under item #4 above.

- 9) ***The plan must address wildlife concerns raised by various agencies (see April 29, 1993 letter from Timothy H. Provan of the Utah Division of Wildlife Resources to Pamela Grubaugh-Littig of the Division; the May 7, 1993 letter from Kenneth W. Phippen of the Utah Division of Wildlife Resources to Dale L. Harber of the Manti LaSal National Forest; and the May 17, 1993 letter from Robert D. Williams of the US Fish and Wildlife Service to Pamela Grubaugh-Littig of the Division).***

The April 29, 1993 letter does not pertain to this amendment but was in reference to an Incidental Boundary Change at the Deer Creek Mine.

Concerns listed in the May 7, 1993 letter are being addressed by the USFS.

Concerns listed in the May 17, 1993 letter have already been addressed in the July 8, 1993 letter to Pamela Grubaugh-Littig where Table 1 was revised on June 28, 1993, Pages 18 and 19 of the drilling application.

- 10) ***The plan must include an Order I Soil Survey, as specified under R645-301-222 et. seq., R645-301-223 and the Division's Guidelines for the Management of Topsoil and Overburden. The soil survey must also meet the standards of the National Cooperative Soil Survey, as referenced in R645-302-314.100. The survey must encompass the proposed disturbance associated with the exploration proposal (i.e. roads and drill pads).***

Information will be submitted at a later date.

- 11) ***The Operator must commit to removing and segregating as a separate layer, all topsoil (as defined by the soil survey) from the area to be disturbed (see R645-301-232.100). The Operator must describe the methods and equipment which will be used to insure that the proper depth of topsoil is removed (see R645-301-231.100).***

Will be coordinated with Item #10 and handled at a later date.

- 12) ***The Operator's proposal to store and protect topsoil is not adequate and must be revised. Topsoil which is salvaged must be stockpiled and protected using a containment berm and/or silt fence around the perimeter of each stockpile. The topsoil stockpiles must be stabilized using a sterile nurse crop, surface mulch and/or other acceptable methods.***

This concern will be addressed as part of the response to Item 10.

- 13) ***The Operator must commit to notifying the Division prior to the commencement of reclamation activities.***

Page 9 of the 1993 Drilling Application was revised August 10, 1993 and seven (7) copies are enclosed under item #4.

- 14) ***Henry Sauer of the Division requests an onsite review of the results of the reclamation activities conducted on exploration drill holes EM149 through EM152 and the associated drill hole access roads. Reclamation methods and topsoil handling procedures are similar to those currently proposed for the reclamation of drill holes TMTN-9 through TMTN-15 and their associated access roads.***

Henry Sauer accompanied by Susan White, both of the Division, were on site on August 3, 1993. East Mountain drill holes and Trail Mountain proposed holes were examined.

Additionally seven (7) copies of the archeological report prepared by AERC are provided for placement in Attachment 4 of the 1993 Drilling Application.

If you have any questions please feel free to contact Karl R. Houskeeper or myself at 653-2312.

Sincerely,



Val Payne

Sr. Environmental Engineer

KRH/dw
Enclosures

cc: Steve Kochevar
Larry LaFrentz
J. Blake Webster
Scott Child