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July 9, 1993

TO: Pamela Grubaugh-Littig, Permit Supervisor

FROM: Jess Kelley, Reclamation Engineer *JK*

RE: Deficiencies in Coal Exploration Application, PacifiCorp, Trail Mountain Mine, ACT/015/009-93B, Folder #2, Emery County, Utah

SYNOPSIS

On April 12, 1993, the permittee submitted, for Division approval, a plan to drill seven (7) coal exploration holes within the present approved permit area. The drilling of these holes involves not only the construction of drill pads and mud pits for the actual drilling operations, but also the construction and reopening of roads for access to the drilling sites. I have reviewed this plan and have found it to contain a number of deficiencies.

ANALYSIS

The deficiencies in the exploratory drilling plan are as follows:

- 1) Since the exploratory drilling will all be done within the present permit area, and since the area disturbed by the drilling will increase the present disturbed area by almost 50%, this plan *cannot* be treated as an exploration permit, as it is at present, but must instead be treated as a *major revision* of the approved permit (see R645-200-121 and R645-303-224.100). This being the case, the planned operations are subject to the R645 rules just like any other part of the mining and reclamation operation.
- 2) The plan contains only a very general description of the soils which are found in the area which will be disturbed. A complete application, however, must contain the results of a soil survey and must characterize those soils as well (see R645-301-222 and R645-301-223).



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- 3) The area disturbed by the exploration must be shown on all relevant maps as part of the disturbed area (see R645-301-521.163).
- 4) 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).
- 5) Page 3 of the plan says that, if a drill site is level, the topsoil will not be removed and stockpiled. However, even on a level site where no earthwork is necessary, the topsoil must be removed and stockpiled *at least* in the mud pit area in order to protect the topsoil from contamination which might adversely affect revegetation efforts (see R645-301-234.220).

RECOMMENDATIONS

It is recommended that the permittee correct the deficiencies listed above before the exploratory drilling plan is approved.

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