



State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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October 13, 1994

TO: File

FROM: Jess Kelley, Reclamation Engineer *JK*

RE: Division Review of Notice of Intention to Conduct Minor Coal Exploration (NOI), Trail Mountain Mine, PacifiCorp, ACT/015/009, Folder #2, Emery County, Utah

SYNOPSIS

On April 12, 1993, the permittee submitted, for Division approval, a plan to drill 7 coal exploration holes within the present approved permit area. The drilling of these holes was to involve 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.

The permittee submitted a revised version of the drilling plan on December 16, 1993. By the revised plan, the permittee proposed to drill 13 holes instead of the original 7.

Since the exploratory drilling was all to be done within the present permit area, and since the area disturbed by the drilling would have increased the present disturbed area by more than 15%, the plan was at first treated as a major revision of the approved permit. However, the R645- coal exploration rules were amended, effective October 1, 1994. As the coal exploration rules now stand, any exploration which removes less than 250 tons of coal from lands designated as suitable for mining requires only that the permittee submit and the Division review a Notice of Intention to Conduct Minor Coal Exploration ("NOI"). In the case of exploration of a federal coal lease, 43 CFR Parts 3480-3487 mandates that final approval or disapproval of the NOI is the responsibility of the Bureau of Land Management ("BLM") and the governing land management agency. The content of the NOI is also prescribed in 43 CFR Parts 3480-3487.

The Division's responsibility with respect to the NOI is to review the NOI and advise the governing resource and land management agencies of the results of that review. Since in this case the proposed drilling is to take place in a federal coal



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lease, and since the surface area is owned by the U. S. Forest Service ("USFS"), then the Division must report the results of its review of the NOI to BLM and USFS.

ANALYSIS

This reviewer still finds two deficiencies in the present submittal:

1) The submittal contains no description of how the access roads are to be reclaimed or their final surface configuration.

2) The reclamation cost estimate does not contain adequate information. The text gives no source for the stated hourly equipment and labor rates and there is no demonstration of how the road and pad reclamation volumes, time requirements, and costs were calculated.

RECOMMENDATIONS

It is recommended that BLM and USFS be advised of the above deficiencies in the NOI.

vb

cc: D. Haddock
P. Grubaugh-Littig

TMDRLLNG.NOI.