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

Michael O. Leavitt
Governor

Ted Stewart
Executive Director

James W. Carter
Division Director

355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203
801-538-5340
801-359-3940 (Fax)
801-538-5319 (TDD)

December 13, 1994

Val Payne
Sr. Environmental Engineer
PacifiCorp
P. O. Box 1005
Huntington, Utah 84528

Re: Renewal Application, PacifiCorp, Trail Mountain Mine, ACT/015/009-94C, Folder #3, Emery County, Utah

Dear Mr. Payne:

The Division has completed a review of your application for renewal of the Trail Mountain Mine permit. The information has been found to be adequate to proceed with the public participation process. At this time you should publish a Notice of Complete Permit Renewal Application, as required by R645-300-121.100. A copy of the publication notice should be sent to the Division as soon as it is available.

While your application may be considered administratively complete, there remain a number of technical and formatting problems with it. Enclosed is a technical review which discusses the problems. Please examine the review document carefully, making particular note of the requirement sections. PacifiCorp must complete the requirements as indicated by no later than January 20, 1995.

Please call if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Daron R. Haddock".

Daron R. Haddock
Permit Supervisor

Enclosure

cc: P. Grubaugh-Littig
S. Johnson
J. Kelley
S. White

RECOVER.TMM



Permit Renewal Technical Review

Trail Mountain Mine
PacifiCorp
ACT/015/009

December 13, 1994

LEGAL AND FINANCIAL RELATED INFORMATION

Analysis:

Based on the legal description in the 1990 Findings Document and the 1991 Federal Lease Findings Document, the legal description in the renewal application is the same except that Lots 1 and 2 were omitted from Section 35. The description does not state that all of Section 35 is included as shown on the permit map.

The new submittal states that the disturbed area is 10.02 acres. According to the latest, 1993, Exhibit A, Surface Disturbance, of the Reclamation Agreement, the disturbed area is 24.78 acres. No change to this agreement was found in the files. Therefore, the permit document must be revised to state that 24.78 acres have been disturbed or provide evidence that a lesser amount has been disturbed.

The revision is in a highlight strike out format with all new pages having a revision date of 10/21/94. All of Chapter 3 was replaced and has the 10/21/94 date. Many of the pages of Chapter 3 were simply renumbered or have non-substantive changes. This will be confusing in the future to have 10/21/94 dates on pages which have minimal or no revisions. When approved as part of the permit package this date will imply that the Division has done a comprehensive review of the permit as recently as 10/21/94. Only those pages with substantive changes should include the revision date of 10/21/94.

Requirements:

The following must be changed or clarified prior to approval.

- 1) The status of Section 35 must be clarified.
- 2) The disturbed area acreage must reflect the acreage of the most current Reclamation Agreement.
- 3) Only those pages with substantive changes should have a revision date of 10/21/94.

CLEAR AND CONCISE APPLICATION

Analysis:

Since the last 5-year renewal, this mine has changed owners. The owner and permittee is now PacifiCorp. The permittee has reformatted and updated the plan to more accurately represent the existing operation and to reflect the change of ownership. Most of the content of the plan has not changed.

The new plan appears to have been compiled rather haphazardly. There are many inconsistencies and omissions and the result is that the plan is difficult to follow and is still, in many respects, not up-to-date. Needless to say, the plan must be updated as an integral whole so that it accurately describes the operation as it is and in a way that the text itself is internally consistent; i.e., map numbers must be correct and the text must not refer to maps that aren't there.

Findings:

Numerous inconsistencies and omissions exist in the renewal application. The result is that the plan is difficult to follow and is still, in many respects, not up-to-date.

Requirements:

- 1) The permittee must proofread the plan, update the maps where necessary, and clean up and coordinate the text to make the plan a current and orderly document. The following are problems in the plan which are fairly typical. It should be noted that this list is not complete. There may be others.
 - a) The main portal is listed on page 3-1, but it is not shown on Plate 3-1--*Surface Facilities*.
 - b) Page 3-19 mentions Plate 3-3, but the plan says elsewhere that this plate has been removed.
 - c) On page 2-17, the property description of T18S, R6E, Section 2 is "N2¼NE¼SE¼." The "N2" is obviously incorrect. It appears that it should read "NE" instead, but this should be verified before it is changed.
 - d) Page 3-61 mentions Plate 3-5, but there is no Plate 3-5 in the plan.

- e) Page 3-82 says that Plate 3-6 shows cross sections, but Plate 3-6 shows mining plans. Operational and post-mining cross sections are shown on Plates 3-17 and 3-17A.
- f) Plate 3-6--*Mining Plans* needs to be updated. It was last updated in 1988 and the mining plans have changed since then.
- g) Plate 3-10--*Permit Boundary* needs to be updated. It was last updated in 1988 and the permit boundary has changed several times since then.
- h) Plate 4-2--*Surface Ownership Map* needs to be updated. It was last updated in 1988 and surface ownership has changed since then.
- i) In general, the maps are mislabeled in that they do not reflect the change of ownership from Mountain Coal Company to PacifiCorp. And some of them are not numbered correctly or are not numbered at all, which makes them inconsistent with the general format of the text and difficult to find.

HYDROLOGY

Analysis:

PacifiCorp revised the hydrology in Sections 3.4.3.1 through 3.4.3.4. Section 3.4.3.1 has been updated to include information on the groundwater hydrology of the mine and surrounding area. Information changed includes geology, quantity and quality. PacifiCorp has made some generalized conclusions in this section without referencing the sources. Much of this information is restated from Chapter 7 and could be referred to that chapter. Information on the spring inventory has been removed from the Groundwater Quantity section and some information about water pumped from the mine has been removed from the Groundwater Quality section, but both should have been left in their respective sections.

Section 3.4.3.4 addresses the projected impacts of mining on the surface water hydrologic balance. Again, there are statements made in this section that are not referenced properly, whether from other parts of the plan or external sources. The entire section on surface-water quality has been removed. This section is important to the operational plan and should be left in the plan.

Findings:

PacifiCorp has deleted information from Sections 3.4.3.1 and 3.4.3.4 regarding the groundwater quantity and quality, and surface-water quality. Other information in these sections has not been adequately referenced and is used for making judgement on the potential impacts to the hydrologic balance.

Requirements:

- 1) PacifiCorp must retain information about spring inventories, groundwater quality and surface-water quality in their respective sections.
- 2) PacifiCorp must reference information used to make conclusions about the hydrology, groundwater and surface-water.