



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

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Mine file

March 10, 1994

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

Re: Initial Completeness of Significant Revision, 1994 Trail Mountain Drilling, Trail Mountain Mine, ACT/015/009-931, Folder #3, Emery County, Utah

Dear Mr. Payne:

The Trail Mountain drilling proposed by PacifiCorp submitted December 16, 1993, has been determined to be a significant revision. This proposal entails the disturbance of an additional 9.58 acres within the permit area (the currently disturbed acreage is 24.78 acres within the permit area). Therefore, this proposal is considered a significant permit revision, as required by Utah Admin. R. 645-303-224.100, due to the fact that there is an increase of greater than 15%, i.e. 38.6%.

As you are aware, the Division is in the process of promulgating new regulations for coal exploration. If, after enactment of these regulations you would like to amend your permit to clearly differentiate exploration activities from mining activities, the Division will consider that application for permit change upon its own merits.

Under our present regulations, initial review of the proposal determines this significant revision to be incomplete. Completeness issues identified were:

R. 645-301-200 - Soils

For the portion of the permit area to be affected by surface operations incident to underground coal mining and reclamation activities, the permittee must present an Order I Soil Survey (see R. 645-301-222 et seq., R. 645-301-223, and the Division Guidelines for the Management of Topsoil and Overburden), which meets the standards of the National Cooperative Soil Survey as incorporated by reference in R. 645-302-314.100. The survey must encompass the disturbance associated with the exploration drilling proposal (i.e. roads and drill pads).



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In attachment 9 of the 1994 drilling proposal, the permittee states that a soil survey has been done and will be the basis for the topsoil removal plan. This soil survey and the topsoil removal plan must be submitted to the Division, for review, upon receipt.

R. 645-301-300 - Biology

The permittee states that a vegetation survey has been completed. This survey must be submitted with the permit proposal.

R. 645-301-500- Engineering

The maps have not been certified by a qualified, registered, professional engineer (see R. 645-301-521.160).

The proposal contains no description of how the access roads are to be reclaimed (see R. 645-301-534.140). The submittal is ambiguous in that parts of it seem to indicate that the access roads will not be regraded, while the reclamation cost implies that the roads will be at least partially regraded.

R. 645-301-700 - Hydrology

There is no hydrology discussion other than drill hole plugging, and the cursory discussion of using silt fences if necessary around drill site areas. There are no specifics regarding the actual location of treatment areas. All applicable hydrology regulations must be addressed, as were done in the 1993 drilling report.

R. 645-301-800 - Bonding

The reclamation cost estimate does not contain adequate information (see R. 645-301-830). The text gives no source for the stated hourly equipment and labor rates. There is no demonstration of how the road and pad reclamation times and costs were calculated.

Preliminary Technical Deficiencies

On page six of the drilling proposal, the following statement is made:
"Reclamation work requires all roads not obliterated to have water bars

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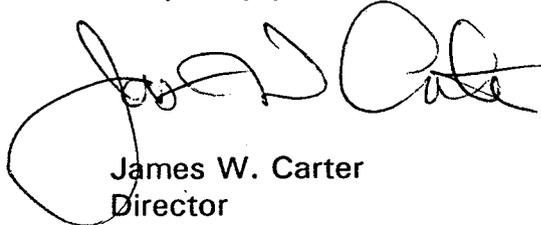
installed...." Does this statement infer that some roads will be not be regraded and/or remain as permanent features? Please clarify.

On page five of the drilling proposal, the permittee makes a contradictory statement with regard to topsoil removal from the drill pads. Since drill pad area soils are more susceptible to impacts related to drilling equipment (i.e. oil, grease and drilling mud contamination and excessive compaction), topsoil must be removed from all drill pads. A variance from the requirement of R. 645-301-232 may be granted by the Division where the permittee can demonstrate that the criteria set forth under R. 645-301-232.710 apply.

Wildlife protection and enhancement measures that will be used during the operation and reclamation phases of the proposed project must be stated.

Please submit the required information.

Very truly yours,

A handwritten signature in black ink, appearing to read "James W. Carter", is written over a large, stylized circular flourish.

James W. Carter
Director

vb
cc: L. Braxton
P. Grubaugh-Littig
015009TM