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State of Utah

DEPARTMENT OF NATURAL RESOURCES

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Division of Oil, Gas and Mining

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March 5, 2015

Kenneth S. Fleck, Manager of Geology and Environmental Affairs
Energy West Mining Company
P.O. Box 310
Huntington, Utah 84528

Subject: Determination of Administrative Completeness for Waste Rock Site Addition,
PacifiCorp, Trail Mountain Mine, C/015/0009, Task ID #4790

Dear Mr. Fleck:

The Division has completed a review of the information you submitted on January 30, 2015. This application is considered to be administratively complete. A copy of our review worksheet is enclosed for your information and records.

A technical review of your plan has been initiated. Technical deficiencies will be forwarded to you as reviews are completed. The Division will also coordinate with other agencies and incorporate their comments into our review process. Issues raised will need to be resolved prior to permit issuance.

At this time you should publish a Notice of Complete Application for adding the Waste Rock Site to the Trail Mountain Mine as required by R645-300-121. A copy of the publication affidavit should be sent to the Division as soon as it is available. You should also insure that a copy of the application is on file at the appropriate County Courthouse. The Division will complete a technical analysis, which must find that your application is technically complete. We anticipate additional information may be necessary to make your application technically complete and look forward to working with you throughout the process.

Please call if you have any questions. Thank you for your help in the permitting process.

Sincerely,

Daron R. Haddock
Coal Program Manager

DRH/sqs
Enclosure
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**ADMINISTRATIVE COMPLETENESS REVIEW WORKSHEET
(R645-100)**

DATE: 03/02/2015

REVIEWER(S): Lisa Reinhart, Priscilla Burton

APPLICANT: Energy West Mining Company

MINE NAME: Trail Mountain Mine **FILE NO.:** C/015/0009

"Administratively Complete Application" means an application for permit approval or approval for coal exploration, where required, which the Division determines to contain information addressing each application requirement of the State Program and to contain all information necessary to initiate processing and public review.

Directions: The categories listed below correspond to the minimum requirements for information necessary to initiate processing and public review. If a category is checked the Applicant has met the Completeness requirement for that category. If a category is not checked, the Completeness requirements have not been met. The comments column will identify the deficiency and what is necessary to correct it.

Comments

			Comments
301-112	Identification of Interests	<u>X</u>	Although the information is not provided in this specific ammendment, it is all provided in the related ammendment for the revision of the legal and financial information which is directly related to the transfer of the waste rock site but is evaluated as a separate task (4791).
100	Applicant's Business Structure	<u>X</u>	Included in Task 4791 for the Cottonwilberg, Deer Creek and Trail Mountain permits.
210	Applicant's Name/Address/Phone	<u>X</u>	
220	Resident Agent's Name/Address/Phone	<u>X</u>	
230	Name/Address/Phone of AML Fees Payer	<u>X</u>	
300	Corporate Structure & Ownership	<u>X</u>	Included in Task 4791 for the Cottonwilberg, Deer Creek and Trail Mountain permits.
400	Identify Other Mining Operations in US	<u>X</u>	
500	Surface & Mineral Ownership	<u>X</u>	
600	Ownership Contiguous to Permit	<u>X</u>	
700	MSHA Numbers	<u>X</u>	

800	Interest in Contiguous Lands	<u>X</u>	
301-113	Violation Information	<u>X</u>	An AVS check was performed on February 6, 2015. There were no violations retrieved by the system.
100	Suspension or Revocation Information	<u>X</u>	None
300	List of Violations - 3 Previous Years	<u>X</u>	Provided for in the AVS review.
301-114	Right of Entry	<u>X</u>	<p>PacifiCorp was granted a BLM right-of-way for the additional permit area (BLM Right-of-Way Grant UTU-65027). This 25.85 acre site was permitted to replace the "old" Cottonwood Waste Rock Storage Area: UTU-37642 which reached designed capacity. The Right-of-Way grant was issued by the BLM on June 8, 1990.</p> <p>BLM Right-of-Way UTU-65027, issued to PacifiCorp, provides right of entry for the Waste Rock Storage Facility. An updated description is found in the PacifiCorp/Energy West Mining Company, Legal and Financial Volume, Appendix G.</p>
301-115	Status of Unsuitability Claims	<u>X</u>	None
301-116	Permit Term	<u>X</u>	The permit term is five years. The permit was renewed on January 5 th , 2015 effective February 21, 2015
301-117	Insurance	<u>X</u>	Insurance is provided by Associated Electric and Gas InsurancesServices limited, Policy # XL5194003P
	Proof of Publication	<u>X</u>	The division received a proposed notice of publication to include the waste rock site in the Trail Mountain permit.
	Facilities and Structures Used in Common	<u>X</u>	

301-118	Filing Fee	<u>X</u>	Not required for a significant revision.
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301-123	Notarized Signature of Responsible Official	<u>X</u>	Included in the C
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301-130	Information Collection: Technical Data Accompanied by Names of Persons or Organizations that Collected and Analyzed the Data - Dates of Collections - and Analysis of the Data and Description of the Methodology Used to Collect and Analyze Data	<u>X</u>	Included in the application
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301-200	Soils	<u>X</u>	Addition of the Trail Mountain Waste Rock site. Location is shown on Map 3-4
211	Description of Pre-mining Soil Resources	<u>X</u>	MRP Vol 1 Section 3.4.1.1, Map 4-3, MRP Vol 4 Appendix A
221	Prime Farmland Investigation	<u>X</u>	MRP Vol 4 Section R645-301-221
222	Soil Survey	<u>X</u>	Vol 4, R645-301-200 Appendix A, B, & C
224	Substitute Topsoil Info (When Proposed)	<u>X</u>	n/a for the waste rock site.
230	Operation Plan Topsoil Handling/Removal/Storage	<u>X</u>	MRP Vol 4 Sections R645-301-230 through 234 and Section R645-301-526, Maps 4-4, 4-5, 4-11A, 4-11B, 7-1, and 7-2.
240	Reclamation Plan Soil Redistribution/Stabilization	<u>X</u>	MRP Vol 1 Sections 3.4.9 and Section 3.5.5.1; MRP Vol 4 Sections R645-301-240 through 244 and R645-301-340 and R645-301-536 and R645-301-540 and R645-301-553 and R645-301-553.140 and R645-301-752, Maps 4-6, 4-7, 4-10

301-300	Biology	<u>X</u>	The application proposes no changes to the existing and approved MRP for both Cottonwood/Wilberg or Trail Mountain and therefore will not affect existing resources or current land use.
320	Vegetation Information	<u>X</u>	

322	Fish and Wildlife Information	<u>X</u>	
323	Maps/Photos Vegetation-Fish-Wildlife Areas	<u>X</u>	
330	Operation Plan Vegetation-Fish-Wildlife Protection	<u>X</u>	
341	Reclamation Plan for Revegetation	<u>X</u>	
342	Fish & Wildlife Plan for Reclamation Phase	<u>X</u>	

301-400	Land Use and Air Quality	<u>X</u>	Chapter 4, page 4 states an intensive archeological evaluation was conducted of the waste rock disposal and access road areas. It was reported that no cultural resource sites or isolated cultural material were observed during the evaluation.
411	Pre-Mining Land Use Information (Includes Cultural Resources)	<u>X</u>	
412	Post-Mining Land Use Information	<u>X</u>	

301-500	Engineering	<u>X</u>	
510 520	General Description of Operation Plan (Maps, Locations, Cross-Sections, Narrative, Descriptions & Calculations)	<u>X</u>	
522	Coal Recovery Description	<u>X</u>	Not Applicable to this amendment
523	Mining Methods	<u>X</u>	Not Applicable to this amendment
524	Blasting and Explosives Plan	<u>X</u>	Not Applicable to this amendment
525	Subsidence Control Plan	<u>X</u>	Not Applicable to this amendment
526	Mine Facilities Description (Narrative, Plans, Maps) Including Existing Structures & Support Facilities	<u>X</u>	

527	Transportation Facilities (Including Plans & Maps)	<u>X</u>	Not Applicable to this amendment
528	Coal Mine Waste Plans (Description & Designs)	<u>X</u>	
529	Management of Mine Openings (Design)	<u>X</u>	Not Applicable to this amendment
531	General Plans for Structures	<u>X</u>	
532	Sediment Control	<u>X</u>	
533	Impoundments	<u>X</u>	Not Applicable to this amendment

301-534	Roads (Plans, Drawings, Designs, & Specifications)	<u>X</u>	
535	Spoil	—	Not Applicable to this amendment
536	Coal Mine Waste	<u>X</u>	
537	Regraded Slopes	<u>X</u>	
540 541-542	Reclamation Narrative, Maps and Plans	<u>X</u>	
551	Casing and Sealing Underground Openings	X	Not required for this amendment
553	Backfilling and Grading Description	<u>X</u>	

301-600	Geology	<u>X</u>	Not required for this amendment
621	Description of Geology (Permit & Adjacent Area)	<u>X</u>	Not Applicable to this amendment
622	Geologic Cross-Sections, Maps, and Plans	<u>X</u>	Not Applicable to this amendment
630	Plans for Casing and Sealing Holes	<u>X</u>	Not Applicable to this amendment

301-700	Hydrology	<u>X</u>	The application provides a section outlining the hydrologic function associated with the waste rock site.
721	Description of Hydrologic Resources (Permit and Adjacent Area)	<u>X</u>	The application provides an Environmental Description narrative and map of the hydrologic features associated with the waste rock site per R645-301-720.
722	Cross-Sections and Maps Subsurface Water - Surface Water - Monitoring Stations - Wells	<u>X</u>	Maps and drawings of the waste rock site are included in the application per R645-301-722.
723	Sampling and Analysis	<u>X</u>	A Sampling and Analysis protocol at the waste rock site currently meets the minimum requirements hydrology requirements per R645-301-723. This sampling protocol will be carried through in the transfer of the permit.
724	Baseline Information Ground Water - Surface Water - Geology - Climatological & Supplemental; If Needed	<u>X</u>	Hydrologic baseline data at the waste rock site was performed and approved by the Division at the time the site was permitted.
728	PHC Determination	<u>X</u>	The application provides an adequate analysis of the Probable Hydrologic Consequences of the site. The application shows through studies and records the waste rock site is in a very dry area and has little effect on both the surface and groundwater resources in the area.
730	General Operation Plan Minimize Disturbance to Hydrologic Balance & Compliance with Clean Water Act	<u>X</u>	
731	Ground and Surface Water Protection	<u>X</u>	The Permittee application meets the minimum requirements of Hydraulic-Balance Protection per R645-301-731. Maps are provided showing the surface water outflow location from the waste rock site.
732	Ground and Surface Water Monitoring	<u>X</u>	The application meets the minimum Sediment Control Measure requirements per R645-301-732. Surface runoff from the site will either be routed through the waste rock sediment pond or will be treated by alternative sediment control measures along the access road to the waste rock site.

301-740	Plans and Designs Operation and Reclamation Plan Sediment Control Measures	<u>X</u>	The application meets the minimum Design Criteria and Plan requirements per R645-301-740 by outlining drainage control at the waste rock site.
	Siltation Structures	<u>X</u>	The application meets the minimum requirements of Sediment Control Measures per R645-301-742 by providing a narrative, maps, and cross-sections of impoundments and diversions. The Permittee will route the vast majority of water to the waste rock pond located at the site. The application outlines in remote locations where it is not possible to route water to the waste rock pond, but runoff would not meet effluent limits the plan implements Alternative Sediment Control Areas to treat the runoff.
	Sediment Ponds	<u>X</u>	
	Other Treatment Facilities	<u>X</u>	
	Diversions	<u>X</u>	
	Road Drainage	<u>X</u>	
	Impoundments	<u>X</u>	
	Discharge Structures	<u>X</u>	
	Disposal of Excess Spoil	<u>X</u>	The application meets the minimum requirements for the Disposal of Noncoal Mine Waste per R645-301-747.
	Coal Mine Waste	<u>X</u>	
	Disposal of Non-Coal Mine Waste	<u>X</u>	
Casing and Sealing of Wells	<u>X</u>	The application meets the minimum Casing and Sealing of Wells requirement per R645-301-748 by outlining a plan for such within the permit area.	

301-800	Bonding and Insurance	<u>X</u>	Included in the application and notice of publication.
820	Applicant Have Adequate Bond at Permit Issuance	<u>X</u>	Included in the five year permit renewal effective February 21, 2015
830	Bond Estimate and Calculations Provided	<u>X</u>	See Volume 1, Chapter 3, Appendix 1 of the Trail Mountain Mine MRP. New estimate calculated by Division adding the waste rock site costs from the 2011 Midterm Permit Review (Task ID's #4106 / 4078)

890	Certificate of Insurance Provided	<u>X</u>	Included in the five year permit renewal effective February 21, 2015
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302-200	Special Categories of Mining	<u>X</u>	Not Applicable to this amendment
210	Experimental Practices Mining	<u>X</u>	Not Applicable to this amendment
220	Mountaintop Removal Mining	<u>X</u>	Not Applicable to this amendment
230	Steep Slope Mining	<u>X</u>	Not Applicable to this amendment
240	Auger Mining	<u>X</u>	Not Applicable to this amendment
250	In Situ Processing Activities	<u>X</u>	Not Applicable to this amendment

302-260	Coal Processing Plants (Not Located Within Permit Area of Mine)	<u>X</u>	Not Applicable to this amendment
270	Variances From Approximate Original Contour Restoration Requirements	<u>X</u>	Not Applicable to this amendment
280	Variances for Delay in Contemporaneous Reclamation Requirement in Combined Surface and Underground Coal Mining Activities	<u>X</u>	Not Applicable to this amendment
290	Small Operator Assistance Program (SOAP)	<u>X</u>	Not Applicable to this amendment

302-300	Special Areas of Mining	<u>X</u>	Not Applicable to this amendment
301	Prime Farmland	<u>X</u>	Not Applicable to this amendment
302	Alluvial Valley Floors	<u>X</u>	Not Applicable to this amendment