



March 26, 1998

Utah Coal Regulatory Program
Division of Oil, Gas and Mining
1594 West North Temple, Suite 1210
Box 145801
Salt Lake City, Utah 84114-5801

Re: Midterm Review Requirements, PacifiCorp, Des-Bee-Dove Mine,
ACT/015/017, Folder #8, Emery County, Utah.

Attention: Pam Grubaugh-Littig # 2

Copy Cover Letter
to Pam &
Aaron

PacifiCorp, by and through its wholly-owned subsidiary, Energy West Mining Company ("Energy West") as mine operator hereby submit our responses to the midterm review items as outlined in your letter dated February 27, 1998. Each of the items are listed and addressed below:

Midterm Items (italic)

Response (bold italic)

1. *An AVS check to ensure that Ownership and Control information is current and correct.*

Updated copies of the NOV's and PacifiCorp Officers is attached, and is the latest record available. (Replace list of Officers), (Add to the existing list of NOV's) Refer to Attachment #1

In regards to the Resident Agent, this revision was accomplished in January of 1997. Volume 1, Part 1, (Refer to Attached Sheet Pg.1-2, revised 12-12-96, approved Jan. 29, 1997. (Attachment #1)

2. *A review of the bond to ensure that it is in order and that the cost estimate is accurate and is escalated to the appropriate year dollars.*

A review of the bond amount was evaluated and revised to include current conditions and elimination of the haulroad. (Refer to the attached revised sheets of reclamation costs). Volume 2, Part 4, Pages 4-109 to and including 4-147. attachment #2) Also, refer to the revised pages for the bond amount, Volume 2, Part 4, Pages 4-102, and 4-103. (Attachment # 3)

Huntington Office:
(801) 687-9821
Fax (801) 687-2695
Purchasing Fax (801) 687-9092

Deer Creek Mine:
(801) 381-2317
Fax (801) 381-2285

Cottonwood Mine:
(801) 748-2319
Fax (801) 748-2380

3. *A review of the Plan to ensure that the requirements of all permit conditions, division orders, notice of violation abatement plans, and permittee-initiated Plan changes are appropriately incorporated into the Plan document. (Division Order 97A is still outstanding)*

Upon review of the MRP, past violations, abatement Plans, permittee initiated Plan changes and Division Orders, all concerns have been incorporated and reflected as required, with exception of Order 97A, which will be submitted by April 30, 1998. (Refer to the Haul Road Disposition Amendment - 97A, when received)

4. *A review of applicable portions of the permit to ensure that the Plan contains commitments for application of the best technology currently available (BTCA) to prevent additional contributions of suspended solids to stream flows outside of the permit area.*

Upon review of the MRP, alternative sediment control areas (ASCA's) have been addressed and incorporated in the permit. ASCA's are routinely examined on monthly inspections and after storm events. Packet 3-7, map 3 of 3 (CM-10388) is included in Volume 3 which show the locations of these sites (see attachment 4). Refer to Volume 2, Part 3, Pages 3-38 to 3-42. (Refer to Attachment #4)

In further review of the MRP it was concluded that the Surface Facility Map would require revisions and will be included for your review. Refer to attached drawing CM-10388-DS, Plate 3-7, (3 of 3), revisions were made to 2-3 and 3-3 of this group. (Refer to attachment #4) The changes or revisions are listed below. When approved, and in the Division response to the above items, Energy West will make additional copies (7) for distribution to the other agencies, and submit these to the Division.

Drawing 2-3:

remove fuel tank at lower pumphouse

Drawing 3-3:

remove office, bathhouse, warehouse text, concrete pad still in place.

remove underground gasoline tank

remove belt structure for the Little Dove Mine to the Stack Tube.

remove shed by Deseret #2 fan, (Concrete outline remains)

remove pick table

remove Beehive fan Evasae

If there are any questions or further concerns regarding the above response list please call Richard Northrup at 687-4822 or Charles Semborski at 687-4720.

Sincerely,

Richard Northrup
for Mr. Semborski

Charles Semborski

Environmental and Geological Supervisor

cc: Blake Webster
Carl Pollastro
Charles Semborski
Susan Tuttle (file)