



PO Box 310  
Huntington, Utah 84528

February 15, 2001

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

Attn: Daron Haddock

Subject: **Response to Deficiencies for Maple Gulch Portals, Des-Bee-Dove Mine,**  
**ACT/015/017-AM00C-1, Outgoing File**

*Received  
2/15/01  
Response*

PacifiCorp, by and through its wholly-owned subsidiary, Energy West Mining Company ("Energy West") as mine operator, hereby submits responses to the deficiencies of the above referenced amendment.

The attached document attempts to answer deficiencies in the order they were received. The Division's findings will be listed first listed by regulation and deficiency. Followed by PacifiCorp's response in *italics*.

Four redline/strikeout copies are provided for review. One copy has been sent directly to the Price Field Office. Upon approval, Energy West will submit the required copies. If you have any questions or concerns regarding this document, please contact myself at (435) 687-4720 or Dennis Oakley at (435) 687-4825.

Sincerely,

Charles A. Semborski  
Permitting/Geology Supervisor

Enclosures: Response to Technical Analysis Deficiencies  
Redline/Strikeout copies of amended text

Cc: Scott Child (Interwest Mining Company)  
Carl Pollastro (Energy West Mining Company)  
File

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FEB 20 2001

DIVISION OF  
OIL, GAS AND MINING

Huntington Office:  
(435) 687-9821  
Fax (435) 687-2695  
Purchasing Fax (435) 687-9092

Deer Creek Mine:  
(435) 687-2317  
Fax (435) 687-2285

Trail Mountain Mine:  
(435) 748-2140  
Fax (435) 748-5125

## Response to Technical Analysis Deficiencies

The following responses to deficiencies are formatted as found in the technical analysis document. They are broken down into logical section headings similar to the R645 regulations. In each section, the regulation number along with the associated deficiency is followed by the permittee's italicized response.

### REVEGETATION

#### Standards for Success

**R645-301-356**, the amendment must propose a vegetation success standard for consideration at Phase III Bond Release. The standard must be proposed for vegetative and shrub density

*Response:*

***Performance Standard:*** *As described above, soil resources in Maple Gulch are limited. Even though the area lacks topsoil, vegetation has established along the edges of the portal breakouts. During the enhancement project, care was taken to prevent damage to existing vegetation. Rock litter and aesthetically appealing materials were strategically placed along the coal outcrop area to blend the portal sites into the surrounding terrain. Portals were backfilled using rock/debris adjacent to and above the portal openings. Soil and native material from adjacent to and above the portal areas were utilized to establish a vegetative cover over the backfilled openings. ~~Success of the enhancement project will be determined in consultation with the surface management agency as well as input from the Division. Typical revegetation analysis is impractical due to the limited area of impact (20 x 20 feet/portal) and extremely steep terrain.~~*

*Weed control will not be undertaken unless it is determined necessary due to weed dominance and delayed rate of succession. All noxious weeds will be eradicated either chemically or physically if they become established on the site.*

*Rodent damage on revegetated areas will be assessed during monitoring periods. Species specific control measures will be implemented as necessary.*

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*Annual monitoring will also include inspection for rills and gullies. Should these be present, they will be filled and the soil reseeded. Rill and gully repair will follow the regulations set forth in the Coal Rules R645-301-357.360 through R645-301-357.365. As repairs are recognized, the Division will be notified and the affected area will be reported in the annual vegetation report.*

*Because the reclaimed portals are such an insignificant area compared to the area as a whole, vegetation monitoring will be undertaken as outlined in the following table until the performance standards have been met. When these standards are met, Phase III Bond Release will be applied for and the Division may grant the release. Standards for success are outlined below.*

<b>10 Year Revegetation &amp; Monitoring</b>	<b>1<sup>st</sup> Year 2001</b>	<b>2<sup>nd</sup> Year 2002</b>	<b>3<sup>rd</sup> Year 2003</b>	<b>4<sup>th</sup> Year 2004</b>	<b>5<sup>th</sup> Year 2005</b>	<b>6<sup>th</sup> Year 2006</b>	<b>7<sup>th</sup> Year 2007</b>	<b>8<sup>th</sup> Year 2008</b>	<b>9<sup>th</sup> Year 2009</b>	<b>10<sup>th</sup> Year 2010</b>
Plant Monitoring Disease & Pest Control*		✓ ✓								
Soil Stabilization Rills & Gullies		✓	✓	✓	✓	✓	✓	✓	✓	✓
Contingent Seeding		✓			✓					
Revegetation Inventory for Bond Release									✓	✓

*\*Monitoring is conducted once per year during the spring.*

*Standards for success: A reference area will be located adjacent to the reclaimed portals. Cover and diversity of the reclaimed portal areas will be compared to the reference areas.*

*The line intercept or ocular estimation methods will be used to measure cover and species composition. As per the Division's recommendations, the shrub density standard is set at zero (0). Any shrub or woody species found on the site will be recorded by species and numbers and reported in the annual report. The standards for success to be applied for ground cover on the reclaimed areas will be at least equal to 90% (with a 90% confidence level) to that of the respective reference area at the time of bond release.*

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*At the time of bond release, similarity between the reclaimed area and corresponding reference area will compare life forms and/or species present in each community by the use of a similarity index. Indices of similarity provide the means of mathematically comparing the plant communities in the two areas. One of the three indices, or a combination thereof, found in the Vegetation Guidelines, Appendix B will be used to determine the similarity between the reclaimed and reference area. If another index is used, or combination thereof, Division approval will be required. Similarity will be determined successful when the index value is at least 70% of the reference area.*

## APPLICATION FOR PERMIT PROCESSING

<input checked="" type="checkbox"/> Permit Change	<input type="checkbox"/> New Permit	<input type="checkbox"/> Renewal	<input type="checkbox"/> Transfer	<input type="checkbox"/> Exploration	<input type="checkbox"/> Bond Release	Permit Number: <b>C/015/017</b>
Title of Proposal: <b>Amendment to Des-Bee-Dove Mines Permit to Revise Volume 2 Part 4: Appendix IX (Maple Gulch Remote Portal Final Reclamation PacifiCorp, Des-Bee-Dove Mine, ACT/015/017, Emery County, Utah.</b>						Mine: <b>Des-Bee-Dove Mines</b>
						Permittee: <b>PacifiCorp</b>

Description, include reason for application and timing required to implement: **Appendix IX Revised to Reflect Final Reclamation Completed July 2000**

**Instructions:** If you answer yes to any of the first 8 questions (gray), this may be a Significant Revision and require Public Notice. Any questions, please call a Permit Supervisor.

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	1. Change in the size of the Permit Area? _____ acres Disturbed Area? _____ acres <input type="checkbox"/> increase <input checked="" type="checkbox"/> decrease.
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	2. Is the application submitted as a result of a Division Order? DO # _____
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	3. Does application include operations outside a previously identified Cumulative Hydrologic Impact Area?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	4. Does application include operations in hydrologic basins other than as currently approved?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	5. Does application result from cancellation, reduction or increase of insurance or reclamation bond?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	6. Does the application require or include public notice/publication?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	7. Does the application require or include ownership, control, right-of-entry, or compliance information?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	8. Is proposed activity within 100 feet of a public road or cemetery or 300 feet of an occupied dwelling?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	9. Is the application submitted as a result of a Violation? NOV # _____
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	10. Is the application submitted as a result of other laws or regulations or policies? Explain: _____
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	11. Does the application affect the surface landowner or change the post mining land use?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	12. Does the application require or include underground design or mine sequence and timing? (Modification of R2P2?)
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	13. Does the application require or include collection and reporting of any baseline information?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	14. Could the application have any effect on wildlife or vegetation outside the current disturbed area?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	15. Does application require or include soil removal, storage or placement?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	16. Does the application require or include vegetation monitoring, removal or revegetation activities?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	17. Does the application require or include construction, modification, or removal of surface facilities?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	18. Does the application require or include water monitoring, sediment or drainage control measures?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	19. Does the application require or include certified designs, maps, or calculations?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	20. Does the application require or include subsidence control or monitoring?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	21. Have reclamation costs for bonding been provided for?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	22. Does application involve a perennial stream, a stream buffer zone or discharges to a stream?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	23. Does the application affect permits issued by other agencies or permits issued to other entities?

Attach 4 complete copies of the application.

I hereby certify that I am a responsible official of the applicant and that the information contained in this application is true and correct to the best of my information and belief in all respects with the laws of Utah in reference to commitments, undertakings, and obligations, herein.

*Charles A. Semborski*  
 Charles A. Semborski Geology/Permitting Supervisor 2/15/2001  
 Signed - Name - Position - Date

Subscribed and sworn to before me this 15 day of February, 2001.

*Lori Ann Anderson*  
 Notary Public

My Commission Expires: Utah 12/22, 2001 )  
 Attest: STATE OF Utah ) ss:  
 COUNTY OF Emery )

Received by Oil, Gas & Mining

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FEB 20 2001

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