



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

Michael O. Leavitt
 Governor
 Kathleen Clarke
 Executive Director
 Lowell P. Braxton
 Division Director

1594 West North Temple, Suite 1210
 PO Box 145801
 Salt Lake City, Utah 84114-5801
 801-538-5340
 801-359-3940 (Fax)
 801-538-7223 (TDD)

January 22, 2001

TO: ~~_____~~

THRU: Susan M. White, Team Lead *SMW*

FROM: James D. Smith, Reclamation Specialist *JDS*

RE: Technical Analysis for Amendment to Revise Des-Bee-Dove permit
Boundaries, PacifiCorp, Des Bee Dove Mine, C 01-1017-AM00D

SUMMARY:

Proposed changes to the Des Bee Dove permit were received on April 14, 2000. This proposed amendment revised the permit area boundaries and updated and reformatted the legal and financial information of Chapter 1 of the permit. A TA discussing the deficiencies in the April submittal was sent to Energy West on June 12, 2000. Energy West's response was received August 3, 2000.

The Division sent a letter to Energy West on September 5, 2000 splitting LF00B into two amendments, continuing amendment LF00B to deal with legal and financial changes to the MRP and initiating AM00D to deal with the permit area reduction. The Division approved LF00B conditionally.

Energy West Action	Date	Division Action	Date
LF00B - Initial Submittal	April 11, 2000	Received	April 14, 2000
		First TA sent	June 12, 2000
LF00B - Second Submittal	July 27, 2000	Received	August 3, 2000
		LF00B and AM00D separated	September 5, 2000
		LF00B conditionally approved	September 5, 2000

TECHNICAL MEMO

OPERATION PLAN

HYDROLOGIC INFORMATION

Regulatory Reference: 30 CFR Sec. 773.17, 774.13, 784.14, 784.16, 784.29, 817.41, 817.42, 817.43, 817.45, 817.49, 817.56, 817.57; R645-300-140, -300-141, -300-142, -300-143, -300-144, -300-145, -300-146, -300-147, -300-147, -300-148, -301-512, -301-514, -301-521, -301-531, -301-532, -301-533, -301-536, -301-542, -301-720, -301-731, -301-732, -301-733, -301-742, -301-743, -301-750, -301-761, -301-764.

Analysis:

The amendment as initially proposed did not contain a surface and groundwater quality and quantity impact analysis for the area being removed from the permit. Such an analysis should assess hydrology data relative to the impact projections and trends contained within the PHC and CHIA, and must show that impacts have been minimized in the permit area and impacts have been minimized and material damage has not occurred in adjacent areas, which includes the area to be removed from the permit. (In other words, to remove an area from the permit, there can be no material damage within that area: has the permittee provided sufficient information and analysis to allow the Division to make a finding that there has been no material damage in the area to be removed from the permit?)

The cover letter with the second (July 2000) submittal stated that, according to the PHC and CHIA, hydrologic impacts associated with the Des-Bee-Dove Mine were projected to be negligible. The letter refers to raw data in the 1999 Annual report; however, the requirement isn't for raw data but for analysis or assessment of available data to show that onsite impacts have been minimized and that offsite impacts and material damage have been prevented.

The cover letter also refers to supportive information on pages 7 and 10 - 11 in Supplemental Information for the Relinquishment of Federal Acreage, East Mountain Logical Unit, June 12, 1995; however, this is not information readily available to the public, and if this information is pertinent to satisfying the requirements of the Coal Mining Rules, it should be incorporated into the Des-Bee-Dove MRP as part of this amendment.

Spring 85-51 is the only spring found in the Des-Bee-Dove permit area, and this spring does not appear to have changed because of mining. Seasonal fluctuations are proportionate to precipitation, as shown in the graph in Appendix H of the 1999 Annual Hydrologic Report, which is reproduced in Attachment 4 of the July 2000 submittal.

Underground mining at Des-Bee-Dove has never intercepted ground water, therefore there has never been discharge to surface drainages. No impacts to surface water have ever been reported within the Des-Bee-Dove area.

Findings:

Information in the cover letter and attachments for the July 2000 response addresses the Operational Hydrologic Information deficiency in the Division's TA of June 2000; however, that information is not in a format that can be inserted into the MRP, so is not adequate to meet the requirements of the Coal Mining Rules. Prior to approval, the Permittee must provide the following, in a format suitable for insertion into the MRP, in accordance with:

R645-301-121.300, -750, in a format suitable for insertion into the MRP, an analysis must be provided assessing hydrology data relative to the impact projections contained within the PHC and CHIA. The analysis must show that onsite impacts have been minimized and that there has been no material damage to the hydrologic balance in the area to be removed from the permit.

RECLAMATION PLAN

GENERAL REQUIREMENTS

Regulatory Reference: PL 95-87 Sec. 515 and 516; 30 CFR Sec. 784.13, 784.14, 784.15, 784.16, 784.17, 784.18, 784.19, 784.20, 784.21, 784.22, 784.23, 784.24, 784.25, 784.26; R645-301-231, -301-233, -301-322, -301-323, -301-331, -301-333, -301-341, -301-342, -301-411, -301-412, -301-422, -301-512, -301-513, -301-521, -301-522, -301-525, -301-526, -301-527, -301-528, -301-529, -301-531, -301-533, -301-534, -301-536, -301-537, -301-542, -301-623, -301-624, -301-625, -301-626, -301-631, -301-632, -301-731, -301-723, -301-724, -301-725, -301-726, -301-728, -301-729, -301-731, -301-732, -301-733, -301-746, -301-764, -301-830.

Analysis:

Letters from the USFS and BLM in Attachment 5 of the July 2000 response indicate that all wells, exploration holes, or bore holes have been cased and sealed, capped, sealed, or backfilled.

According to the cover letter, subsidence monitoring was done using aerial photogrammetry and surveys and helicopter reconnaissance flights. No monuments were ever installed for the purposes of subsidence monitoring.

Findings:

Information in the cover letter and attachments for the July 2000 response addresses the Reclamation Plan deficiencies in the Division's TA of June 2000; however, that information is not in a format that can be inserted into the MRP, so is not adequate to meet the requirements of the Coal Mining Rules. Prior to approval, the Permittee must provide the following, in a format suitable for insertion into the MRP, in accordance with:

TECHNICAL MEMO

R645-301-121.300, -640, in a format suitable for insertion into the MRP, documentation must be provided that all wells, exploration holes, or bore holes have been cased and sealed, capped, sealed, backfilled, or approved for transfer.

RECOMMENDATION:

Prior to approval, the requirements of R645-301-121.300, 640, and 750 must be met as outlined above.

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