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November 15, 2001

TO: Internal File

THRU: Susan M. White, Sr. Reclamation Specialist/ Team Lead *SYM JJ*

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

RE: Technical Analysis for Amendment to Revise Des-Bee-Dove permit Boundaries, PacifiCorp, Des Bee Dove Mine, C/015/017-AM00D-1

SUMMARY:

Proposed changes to the Des Bee Dove permit were initially 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. The review of this amendment became somewhat convoluted: the table below shows the chronology.

The permittee has responded to the deficiencies of the latest TA (February 1, 2001); however, they have done so by appending all information into Volume 1, Part 1 rather than providing the information in a format that can be inserted into the respective sections, such as Engineering, Geology, and Hydrology. This fragments the MRP and makes information harder to locate, but with this site being in reclamation, I do not consider it to be worth another round of deficiencies and responses just to get this information properly located in the MRP.

I recommend that the proposed amendment be approved for insertion into the MRP.

TECHNICAL MEMO

Energy West Action	Date	Division Action	Date
LF00B - Initial Submittal	April 11, 2000	Received	April 14, 2000
		LF00B TA sent	June 12, 2000
LF00B-1	July 27, 2000	Received	August 3, 2000
		LF00B and AM00D separated	September 5, 2000
		LF00B conditionally approved	September 5, 2000
LF00B-2	October 23, 2000	Received	November 1, 2000
		AM00D TA sent	February 1, 2001
		LF00B approved	February 28, 2001
AM00D-1	September 21, 2001	Received	September 24, 2001
		AM00D-1 TA sent	November 2001

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:

An amendment to reduce the permit area should include an assessment of hydrology data relative to the impact projections and trends contained within the PHC and CHIA, and 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, 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?)

Hydrologic Information in Volume 1, Part 1, Appendix F states that, according to the PHC and CHIA, hydrologic impacts associated with the Des-Bee-Dove Mine were projected to be negligible. Raw data are in the 2000 Annual Report, and supportive information is in the Supplemental Information section for the Relinquishment of Federal Acreage, East Mountain Logical Unit, June 12, 1995 on pages 7 and 10-11.

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. Flow data from 1983 to 2000 are summarized in the Hydrologic Information section of Volume 1, Part 1, Appendix F. Seasonal fluctuations at 85-51 are proportionate to precipitation, as shown on the graph included in the Hydrologic Information.

Underground mining at Des-Bee-Dove has never intercepted ground water. Therefore, there has never been discharge to surface drainages. Drainages at Des-Bee-Dove are ephemeral, flowing only in response to precipitation or snowmelt. No impacts to surface water have ever been reported within the Des-Bee-Dove area.

Analysis or assessment of available data show that onsite impacts have been minimized and that offsite impacts and material damage have been prevented.

Findings:

Operation Plan Hydrologic Information in this amendment to the MRP is adequate to meet the requirements of the Coal Mining Rules.

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:

Information in Volume 1, Part 1, Appendix F indicate that all wells, exploration holes, or bore holes have been cased and sealed, capped, sealed, or backfilled. The Exploration Drill Site Information section includes a letter from the USFS stating that EM-2, EM-3, EM-6, EM-9, EM-11c, EM-12c, CM-3, and CM-6 were satisfactorily reclaimed. This section also contains drilling reports for CM-5 and CM-7 that show they were cemented. The Lease Relinquishment Information section contains a letter from the BLM stating that to the best of their knowledge, all known exploration drill holes have been plugged and reclaimed.

TECHNICAL MEMO

Findings:

Information in Volume 1, Part 1, Appendix F on casing and sealing of exploration holes and bore holes is adequate to meet the requirements of the Coal Mining Rules.

RECOMMENDATION:

The proposed amendment should be approved for insertion into the MRP.

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