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# TECHNICAL MEMORANDUM

## Utah Coal Regulatory Program

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January 26, 2012

TO: Internal File

THRU: Steve Christensen, Team Lead *SC*

FROM: April A. Abate, Environmental Scientist III *AAA 1-31-2012*

RE: Midterm Permit Review, PacifiCorp, Des-Bee-Dove, C/015/0017, Task ID #3982

### SUMMARY:

In accordance with R645-303-211, the Division of Oil, Gas, and Mining (the Division) is required to review each active permit during its term. The Division commenced the Midterm Review for the Des Bee Dove Mine on November 30, 2011. This technical review will focus on a review of the geology section of the MRP as well as any geology commitments or permit conditions that appear to be outstanding.

This site is currently in the 10-year liability period of reclamation and pursuing Phase III bond release. This technical memorandum will review any and all commitments and permit conditions relating to the geology requirements of the R645-301-600 sections of the Utah Coal Rules.

The Master List of Commitments was reviewed for any commitments pertaining to geology. No commitments were found.

The latest 5-year permit renewal for the Des Bee Dove Mine was effective August 16, 2010. The Permittee did not have any special conditions pertaining to the geology R645-301-600 rules outlined in their permit (Section 18-Attachment A).

The February 12, 2007 Master Technical Analysis document prepared by the Division did not contain any outstanding findings relating to inadequate geological information.

The geology section of the Des Bee Dove Mining and Reclamation Plan (MRP) was reviewed for completeness. The geology section applicable to the Des Bee Dove permit is actually located in the Deer Creek Mine (Permit #C/015/0018) Volume 8 of the MRP because it covers the geology for the entire East Mountain area. The MRP does not follow the new format where each section header represents a regulation. There is no regulatory requirement to reformat MRPs; however, the Permittee is currently in the process of voluntarily updating the MRP for Deer Creek to be reflective of the new format.

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**Findings:**

**[R645-301-632 and -642]:** Volume 8 of the MRP does not contain a subsidence monitoring plan as specified in the above regulation. If there is a subsidence monitoring plan currently in place but addressed under a different section of the MRP, the plan, as well as the subsidence monitoring point map should be added as a reference here. If no subsidence monitoring has/is currently occurring at the site, then this should also be referenced in this section.

**RECOMMENDATION:**

There are no outstanding commitments or special conditions pertaining to the Utah Coal Rules R645-301-600. One deficiency was identified in the MRP.

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