

# TECHNICAL MEMORANDUM

## Utah Coal Regulatory Program

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January 30, 2012

TO: Internal File

THRU: Steve Christensen, Team Lead *SC*

FROM: Ken Hoffman, Hydrologist *KH*

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 hydrology section of the MRP.

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 hydrology requirements of the R645-301-700 sections of the Utah Coal Rules.

The Master List of Commitments was reviewed for any commitments pertaining to hydrology and comments were incorporated.

The latest 5-year permit renewal for the Des Bee Dove Mine was effective August 16, 2010. The Permittee special condition pertaining to the hydrology R645-301-700 rules outlined in their permit (Section 17-Attachment A) was complied with but is now no longer applicable.

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

The hydrology section of the Des Bee Dove Mining and Reclamation Plan (MRP) was reviewed for completeness. The hydrology section applicable to the Des Bee Dove permit is located in the Cottonwood Mine, Deer Creek Mine, Des-Bee-Dove Mines (Permits #015/019, #C/015/0018, and #015/017) Volume 9 of the MRP because it covers the hydrology for the entire East Mountain area.

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**Findings:**

**R645-301-731.220:** The Permittee must submit updated Volume 9 Appendix A. Specifically, references to UPDES sampling of the reclaimed sedimentation pond for which a UPDES permit no longer exists. **(KH)**

**R645-301-728:** On page 129 of the Mining Method section the Permittee states “Des-Bee-Dove area permit has been and will be mined utilizing continuous miners exclusively” this language shall be updated to indicate mining has been completed. **(KH)**

**RECOMMENDATION:**

There are no outstanding commitments or special conditions pertaining to the Utah Coal Rules R645-301-700. One deficiency was identified in the MRP.

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