

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

May 14, 2012

TO: Internal File

THRU: Steve Christensen, Team Lead *SC*

FROM: April A. Abate, Environmental Scientist III *AAA*
5/22/2012

RE: Midterm Completion Response, PacifiCorp, Des-Bee-Dove, C/015/0017, Task ID #4080

SUMMARY:

The Division received a response to the Midterm Completion deficiency letter dated April 23, 2012 submitted by PacifiCorp (the Permittee) for the Des Bee Dove Mine. The following deficiency was identified in the MRP pertaining to the geology section of the MRP:

[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.

Findings:

The Permittee submitted a response indicating that a subsidence plan was located in Volume 5, Appendix XIII of the MRP but did not provide any replacement text for Volume 8. Volume 8 did not have a reference to the regulations identified in the deficiency.

With the April 23, 2012 submittal, the Permittee submitted an updated text section of volume 8 including updates to Figures G-1, G-2, and G-3 and Table G-1. Page 12 of the text lists references to the subsidence monitoring plans for Des Bee Dove, Cottonwood (Permit #015/019) and Deer Creek Mine (Permit #015/0018 as identified as a deficiency in this round of midterm review.

RECOMMENDATION:

The Permittee has amended the MRP with the subsidence reference information needed for compliance with **R645-301-632 and -642**. Approval is recommended.