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December 19, 1991

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DIVISION OF
OIL GAS & MINING

Ms. Pamela Grubaugh-Littig
Permit Supervisor
Division of Oil, Gas and Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

RE: RESPONSE TO INITIAL COMPLETENESS REVIEW COMMENTS, RILDA CANYON LEASE TRACTS, PACIFICORP ELECTRIC OPERATIONS, DEER CREEK MINE, ACT/015/018, FOLDER #2, EMERY COUNTY, UTAH

Dear Ms. Littig:

Transmitted herewith please find information submitted in response to the above referenced item. The material includes the following and should be used to update the application as described.

Replace pages 2-1 and 2-2 and add pages 2-2.1 through 2-2.3.

Replace page 2-14 and add page 2-14.1.

Replace pages 2-46 and 2-96.

Add pages 2-99 and 2-100.

Also enclosed you will find updated material to insert into Volume 9 - Hydrologic Section (Deer Creek Mine ACT/015/018, Des Bee Dove Mines ACT/015/017 and Cottonwood/Wilberg Mine ACT/015/019). Volume 9, submitted on April 30, 1991, was intended to supersede previous Hydrologic Sections for each individual permit and satisfy PHC related questions concerning the Deer Creek Mine-Rilda Canyon Extension. We apologize for any miscommunications concerning the April 30th submittal. A detailed Table of Contents is included to assist in your review. Please replace the following pages, figures and appendices:

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Table of Contents	Pages ii-iv
List of Figures	Page vi
List of Appendices	Page v
Text Section	Pages 1 through 125
Figures	HF-9 with HF-9a through HF-9f
Appendices	Insert sampling documentation into Appendix A

In addition to updating Volume 9 - Hydrologic Section, two hydrologic reports are being submitted (two copies each). The first entitled "Results of a Resistivity-Induced Polarization Survey: Rilda and Mill Fork Canyons, East Mountain Property," is to clarify the request for more information concerning the geophysical surveys conducted in Rilda Canyon. The second, entitled "Rilda Canyon Pump Test Results," is to support the hydrologic model developed for the Rilda Canyon Springs. These reports are to be considered support documents and will not be included as part of Volume 9.

Earlier this year meetings, in which PacifiCorp presented a hydrologic overview of the East Mountain Permit Areas with emphasis on mining related impacts to the hydrologic balance, were held with various agencies including DOGM, OSM, USFS and the State Department of Natural Resources - Division of Water Rights. Questions were raised with regard to defining the piezometric gradient north of the Roans Canyon Fault and the hydrology of Cottonwood Canyon Creek area. In order to evaluate these two concerns PacifiCorp commits to a comprehensive hydrologic investigation program which will include the following:

1. Conduct resistivity surveys.
 - a. Rilda Canyon: conduct detailed transects in both the right and left forks (Section 29 Township 16 South Range 7 East) to project the thickness of the colluvium-depth to bedrock and define groundwater occurrence.
 - b. Cottonwood Canyon Creek: survey parallel to the creek from Section 11 through Section 24 to define fractures/faults associated with the Roans and Mill Canyon Grabens.

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- c. Cottonwood Canyon Creek: conduct detailed transects to project the thickness of colluvium - depth to bedrock and define groundwater occurrence.**
- 2. Develop in-mine monitoring holes north of the Roans Canyon Fault when long-term monitoring sites can be established.**
- 3. Based on the resistivity surveys and in-mine monitoring, discussions will be held to determine if additional hydrologic information is required.**

It is anticipated that resistivity surveys will be completed by August 1992. Date of completion of the in-mine monitoring holes depends on the rate of development north of the Roans Canyon Fault. A detailed plan will be submitted to DOGM and the Division of Water Rights for review and approval.

I hope this submittal sufficiently addresses all remaining concerns including those identified in the letter of January 7, 1991 from Mr. George A. Morris (USFS) to Mr. Lowell Braxton.

If the information meets your approval, additional copies will be submitted at your request.

Please contact us if you have any concerns or comments.

Sincerely,



**J. Blake Webster
Permitting Administrator**

CAS/VP/sh