



## State of Utah

DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF OIL, GAS AND MININGNorman H. Bangerter  
Governor  
Dee C. Hansen  
Executive Director  
Dianne R. Nielson, Ph.D.  
Division Director355 West North Temple  
3 Triad Center, Suite 350  
Salt Lake City, Utah 84180-1203  
801-538-5340

January 7, 1991

Mr. Robert Hagen, Director  
Office of Surface Mining  
Reclamation and Enforcement  
Suite 310, Silver Square  
625 Silver Avenue, S.W.  
Albuquerque, New Mexico 87102

Dear Mr. Hagen:

Re: Response to Deer Creek Mine's Renewal Application Comments, Utah Power & Light Company (PacifiCorp Electric Operations), Deer Creek Mine, ACT/015/018, Folder #2, Emery County, Utah

In response to your letter dated November 30, 1990, regarding the Deer Creek Mine Renewal Application, the following comments are made.

#### Legal and Financial

The process of transferring the permit from Utah Power and Light Company to PacifiCorp Electric Operations is being undertaken. All bonds have been reissued to PacifiCorp.

PacifiCorp has signed the Division Certificate of Insurance and meets applicable requirements.

#### Alternative Sediment Control Areas

There are nine alternative sediment control areas referenced in the Deer Creek renewal application. Sediment control measures such as silt fences, straw bales, vegetative filter, etc. are approved as the best technology currently available for treating areas not reporting to a sedimentation pond. The drainage from this type of structure is not considered a point source and does not, therefore, need a demonstration to show that effluent limits will be met. Should the

Page 2  
Mr. Robert Hagen  
ACT/015/018  
January 7, 1991

Division of Environmental Health require attainment of effluent limits for non-point source discharges, the Division will require conformance with the regulations in effect at that time.

Experimental Practice

The rewritten regulations do not require the final reclamation of the Deer Creek channel to be considered an experimental practice. Therefore, the permittee will be instructed to remove this from the renewal application.

Deer Creek Waste Rock Disposal

The Division will routinely inspect the "mixing" of different materials at the Deer Creek Waste Rock Site.

Sincerely,



Lowell P. Braxton  
Associate Director, Mining

PGL/jbe  
cc: P. Grubaugh-Littig  
AT015018.7