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March 6, 1992

Mr. Val Payne, Sr. Environmental Engineer
PacifiCorp Electric Operations
P.O. Box 1005
Huntington, Utah 84528

Dear Mr. Payne:

Re: Updates Required for Rilda Canyon Lease Extension Application, PacifiCorp Electric Operations, Deer Creek Mine, ACT/015/018-90-1, Folder #2, Emery County, Utah

The Rilda Canyon Lease Extension application was submitted February 12, 1990, with other updates in October 1990, April 1991, and December 1991. Upon recent review of the application, it appears that there are outdated items that should be revised. All references to Utah Power and Light Company must be deleted and updated to refer to PacifiCorp Electric Operations in the text as well as on all plates. All mine working maps must be updated to the present.

At a meeting with the Bureau of Land Management and Forest Service on February 27, 1992, the preliminary conclusions of Dr. Pariseau's two-dimensional finite element subsidence study were discussed. It is my understanding that PacifiCorp Electric Operations has been working with Dr. Pariseau on the predictive elements of this subsidence study. Therefore, the subsidence portion of the plan should be more comprehensive and reflect the most current subsidence prediction and information.

The April 17, 1990 Forest Service comment letter item number three (3) stated, "The geologic and geotechnical data needs to be presented in the permit application package to predict where there is potential for escarpment failures to occur," which reiterates the need for more detailed subsidence information, as mentioned in the paragraph above.

If this lease extension is a stand alone document, all of the legal and financial information required by R645-301-100 must be included.

Specific items which must be addressed are:

Plate 1-1, Coal Ownership, illustrates the extension area with Lease #U-014275, but this is not shown on other maps or included in the right of entry information. Please correct.

Page 2-4 references "the surface disturbance of 10 acres, of which 6 acres are not included in the reclamation plan," which is a confusing statement. Please clarify.

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The legal description in the "Archaeological Study of East Mountain" is incorrect on page 2-2.2, in regards to "Township 16 South, Range 7 East, Section 33, west half of N1/4, NW1/4 of SW1/4." This should read Section 33, W1/2 NW1/4, NW1/4 SW1/4. The survey also refers to a "2280-acre coal lease tract," page 2-2.2, whereas page 1-1 refers to the extension area of 2371.6 acres. An explanation must be given as to why the entire area is not included.

The letter from the U.S. Fish and Wildlife Service dated November 6, 1980 about threatened and endangered species must be updated (page 2-69). The Forest Service may do a biological evaluation of this area for species on the "sensitive list." It is suspected that a "sensitive" plant may exist in Section 32 which can only be determined when it blooms, i.e., July 1992.

Exhibit "A", page 2-95, does not show the proposed Rilda Canyon Lease Extension. The relevance of this exhibit to this lease extension must be explained.

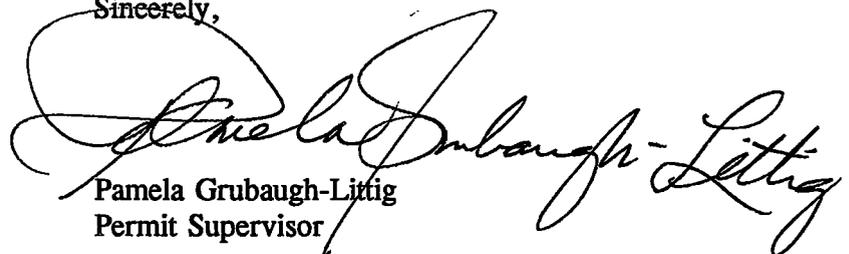
Page 3-2, Figure 1, shows the mine permit boundaries, but does not indicate the proposed Rilda Canyon Lease Extension. All plates, maps and figures must be updated to include the proposed Rilda Canyon Lease Extension in this lease extension application.

Page 3-31 states that "A mining schedule which details the area in which mining is to take place and the planned date of the mining activity has been submitted to the affected surface owners." Please enclose a sample letter and to whom it was sent.

According to R645-301-121.100, the permit application must contain current information. Additionally, the application must contain a notarized signature of a responsible official of the applicant that states the information contained in the application is true and correct to the best of the official's information and belief, R645-301-123.

If you have any questions, please call me.

Sincerely,



Pamela Grubaugh-Littig
Permit Supervisor

jbe
cc: Ken Wyatt
015018RC