



State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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January 14, 1992

Mr. Blake Webster
PacifiCorp Electric Operations
Fuel Resources
One Utah Center; Suite 2100
201 South Main
Salt Lake City, Utah 84140-2100

Dear Mr. Webster:

Re: Waste Rock and Sediment Pond Waste Analysis and Review, PacifiCorp Electric Operations, Cottonwood/Wilberg and Deer Creek Mines, ACT/015/019 and ACT/015/018, Folder #2, Emery County, Utah

Enclosed please find a memo that is a compilation of the analytical results from the waste rock and sediment pond waste disposed of in the Cottonwood/Wilberg Waste Rock Storage Facility Addition, Cell #7, and the Deer Creek Waste Rock Storage Facility. Upon review of the data presented, several concerns arise: 1) There are incomplete data sets for the individual samples; 2) there is incomplete location, lithologic and sample interval information; and 3) the sample preparation procedures are unspecified.

The collection and analysis of waste rock, sedimentation pond waste, roof and floor material, etc. is time-consuming and expensive. Cost effectiveness is important and when the information derived from a sampling program is faulty and/or incomplete, the time and money may not have been used effectively.

It is incumbent upon the permittee to fulfill permit requirements. If unapproved laboratory procedures have been employed, parameters omitted from the analysis, or results indicate that acceptable levels have been exceeded, it is necessary to handle the concern on an individual permit basis.

The collection and analysis of topsoil and overburden should entail a comprehensive quality assurance/quality control program. The Division believes that a cooperative effort in this endeavor would result in a cost effective and comprehensive plan to identify and properly manage suitable plant growth material for contemporaneous and final reclamation.

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ACT/015/019 & ACT/015/018

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It would be in the best interest of all parties involved to have a sound and cost-effective program implemented soon. Please call me to arrange a meeting to discuss this concern with you.

Thank you for your continued cooperation.

Sincerely,

A handwritten signature in cursive script, reading "Pamela Grubaugh-Littig". The signature is written in black ink and is positioned above the printed name and title.

Pamela Grubaugh-Littig
Permit Supervisor

jbe

Enclosure

cc: Henry Sauer
015019WA