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State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

15-18

File

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October 18, 1994

TO: File

FROM: Jess Kelley, Reclamation Engineer *JK*

RE: Division Review of Notice of Intention to Conduct Minor Coal Exploration, Deer Creek Mine, PacifiCorp, ACT/015/018-94I, Folder #2, Emery County, Utah

SYNOPSIS

The permittee submitted this Notice of Intention to Conduct Minor Coal Exploration (NOI) for Division review on October 15, 1994. The intent of the NOI is to allow for the drilling of five exploration holes in the left fork of Rilda Canyon in Federal Coal Lease U-06039.

ANALYSIS

The R645- coal exploration rules were amended, effective October 1, 1994. As the coal exploration rules now stand, any exploration which removes less than 250 tons of coal from lands designated as suitable for mining requires only that the permittee submit and the Division review a NOI. 43 CFR Parts 3480-3487 mandates that final approval or disapproval of the NOI is the responsibility of the Bureau of Land Management (BLM), in the case of exploration of a federal coal lease, and the governing land management agency. The content of the NOI is also prescribed in 43 CFR Parts 3480-3487.

The Division's responsibility with respect to the NOI is to review the NOI and advise the governing resource and land management agencies of the results of that review. Since in this case the proposed drilling will remove less than 250 tons of coal and will take place in a federal coal lease, and since the surface area is owned by the U. S. Forest Service (USFS), then the Division must report the results of its review of the NOI to BLM and USFS.



Page 2
Memo to File
ACT/015/018-94I
October 18, 1994

The permittee plans to drill at least five exploratory holes in the left fork of Rilda Canyon. The purpose of these holes is to determine the extent of burned coal in an area where the permittee wants to mine coal, develop a fan portal and construct other surface facilities.

The holes will be drilled by a portable drill rig which will be transported to the drill sites by helicopter. Water for the drilling will be hauled by truck to a large collapsible tank which will be placed near the end of the Rilda Canyon road. From there, it will be pumped to the individual drill sites through flexible hose which will be placed by hand. The drilling mud will be a biodegradable polymer composition. Water and other drilling fluids will be filtered and recirculated. Drill cuttings will be removed from the sites by helicopter and finally disposed of at the Deer Creek waste rock site. Spill and runoff control at the individual drill sites will be provided by silt fences, brattice barriers, and berms placed below the sites.

When drilling has been completed at a site, that site will be reclaimed immediately. Reclamation will involve the plugging of the hole and hand dressing of the disturbed ground. Reseeding will be done as needed.

This writer finds only two possible problems with the NOI as it now stands.

First, the NOI states that when drilling is complete, the drill holes will be "plugged as directed by the BLM." However, there is no detail regarding the plugging of the holes. The permittee should provide complete information and should commit to filling the holes completely, from bottom to collar, with concrete.

Second, the NOI contains no estimate of the reclamation costs associated with the drilling program and provides no surety or bonding arrangement to underwrite those costs.

RECOMMENDATIONS

It is recommended that BLM and USFS be advised of the above deficiencies in the NOI.

vb
cc: D. Haddock
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DCDRLLNG.NOI