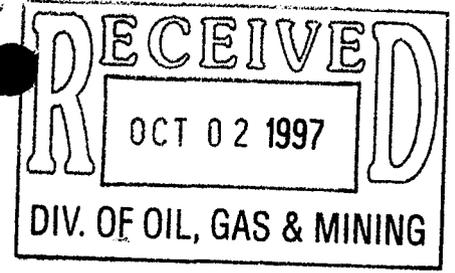


0007

ACT/015/018



September 25, 1997

ACT/015/018 #2
ACT/015/018-97B
Joe
Jim

Utah Coal Regulatory Program
Division of Oil, Gas and Mining
1594 North Temple, Suite 1210
Box 145801
Salt Lake City, Utah 84114-5801

Attention: Mr. Joseph Helfrich
Permit Supervisor

Re: Deficiencies in New Drawings Volume 9, PacifiCorp, Deer Creek, ACT/015/018-97B,
Emery County, Utah

PacifiCorp, by and through its wholly-owned subsidiary, Energy West Mining Company ("Energy West") as mine operator, herewith submits the response to the technical deficiencies dated April 15, 1997. Each of the deficiencies are listed and addressed below:

- | <i>Deficiency (italic)</i> | <i>Response (bold italic)</i> |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <i>Appendix A: Page 7 Wilberg/Cottonwood Mines UT-0022896 is mis-identified as UT-23604 and Trail Mountain Mine UTG040003 is mis-identified as UTG040009.</i> | <i>Appendix A: Page 7 UPDES monitoring locations ID have been revised:
Wilberg/Cottonwood Mines UT-0022896
Trail Mountain Mine UTG040003.</i> |

In addition to the corrections listed above, spring 80-50 (located in Rilda Canyon) was added to the East Mountain Spring monitoring program as a response to deficiencies noted in the review of the North Rilda Area permit extension.

Deficiency (italic)

Response (bold italic)

Maps:

1) *Des-Bee-Dove Special Use Permit is no longer shown on maps HM-1, HM-4 and HM-5.*

Des-Bee-Dove Special Use Permit has been added to maps HM-1, HM-4 and HM-5.

2) *A "star" symbol that is not explained in the Legend appears at several locations along Cottonwood Creek on Maps HM-1 and HM-5.*

Legend has been updated to include "star" symbol on Maps HM-1 and HM-5.

3) *The "arrow" symbol on HM-2 and HM-3 is not explained in the Legend.*
Legend has been updated to include "arrow" symbol on Maps HM-2 and HM-3.

4) *In-mine drill holes shown on the old HM-2 and HM-3 are not on the new HM-2 and HM-3.*

In-mine drill holes have been added to HM-2 and HM-3.

5) *There are no names identifying mains and entries on HM-2, HM-3, and HM-5.*

Mains and entries titles have been added to HM-2, HM-3. Titles were not added to HM-5 due to the scale of the map. HM-5 is included in the Hydrologic Section of the East Mountain permits to document which ground water resources have been or will be undermined within 5 years (updated each year in the Annual Hydrologic and Subsidence reports). Detailed analysis of subsidence is reported in the Annual Subsidence Reports.

HM-1 1) *Springs along Cottonwood Creek, some of which have been monitored in the past and on which there are water rights, were shown on the old HM-1 but are not on this new HM-1 (but are shown on HM-5).*

Springs in Cottonwood Canyon were shown on the "old" HM-1 due to restricted scale of the "old" HM-4 and HM-5. With the conversion to electronic format, HM-4 and HM-5 were expanded to include all of springs related to the East Mountain Property.

Deficiency (italic)

Response (bold italic)

2) *TM-3, a piezometer located in Straight Canyon, and T-19, a surface monitoring point in Straight Canyon, are both listed in Appendix A but not shown on HM-1 (but are shown on HM-5).*

Both TM-3 and T-19 are related to Trail Mountain Property, as listed in Appendix A, refer to Trail Mountain Maps 7-1 and 7-2 for monitor locations.

HM-2 1) Old Des-Bee-Dove Blind Canyon workings in Section 11, T17S, R7E that are shown on the old HM-2 are not shown on this new HM-2.

Des-Bee-Dove mine workings have been added to HM-2 (Blind Canyon Seam) and HM-3 (Hiawatha Seam).

HM-3 1) The Johnson Mine workings shown on the old HM-3 are not on this new HM-3.

HM-3 was updated to include the Johnson Mine workings.

HM-5 1) Surface geology isn't shown, making it difficult to correlate amount (and effects) of subsidence with stratigraphy and outcrops or surface material.

HM-5 has been updated to include geologic formations.

2) *No subsidence is shown for the Trail Mountain area (was there any?).
HM-5 has been revised to include subsidence data from 1996 (no subsidence occurred on the Trail Mountain Property prior to 1995 subsidence reconnaissance).*

3) *The Legend doesn't indicate which hatching pattern represents which coal seam.*

HM-5 Legend has been revised to include hatch pattern for each seam.

4) *Mining is projected outside the permit area in the North Rilda Area.
Mine projections within the North Rilda on HM-5 have revised.*

5) *The location of T-19 is within the map coverage but T-19 is not marked.
T-19 is a surface monitoring site which is shown on HM-1 and HM-4.
HM-5 includes only ground water resources.*

Division of Oil, Gas and Mining
September 25, 1997
Page four

In response to the deficiencies the following maps and text have been revised:

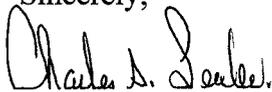
Revised Maps: HM-1
 HM-2
 HM-3
 HM-4
 HM-5

Revised Text: Appendix A

Enclosed is seven (7) certified copies of maps HM-1 through HM-5 along with seven (7) copies of Appendix A.

Thank you again for your assistance and quick response on finalizing this permit admendment. If there are any questions or concerns please call Chuck Semborski at 687-4720 or Bob Willey 687-4722.

Sincerely,



Charles A. Semborski
Geology and Environmental Supervisor
enclosures:

CC: Blake Webster
 Carl Pollastro
 Chuck Semborski
 Barbara Adams (File)

File: Vol. 2\pcccommon\eng\environmental\dc\volume11\dogmdef.997

APPLICATION FOR PERMIT PROCESSING

<input type="checkbox"/> Permit Change	<input type="checkbox"/> New Permit	<input type="checkbox"/> Renewal	<input type="checkbox"/> Transfer	<input type="checkbox"/> Exploration	<input type="checkbox"/> Bond Release	Permit Number: ACT/015/018
Title of Proposal: Deficiencies in New Drawings Volume 9, PacifiCorp, Deer Creek Mine						Mine: DEER CREEK
ACT/015/018-97B, Emery County, Utah						Permittee: PACIFICORP

Description, include reason for application and timing required to implement: **Revise Hydrologic Maps and Appendix A of Volume 9/Hydrologic Section**

Instructions: If you answer yes to any of the first 8 questions (gray), submit the application to the Salt Lake Office. Otherwise, you may submit it to your reclamation specialist.

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	1. Change in the size of the Permit Area? _____ acres Disturbed Area? _____ acres <input type="checkbox"/> increase <input type="checkbox"/> decrease.
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	2. Is the application submitted as a result of a Division Order? DO # _____
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	3. Does application include operations outside a previously identified Cumulative Hydrologic Impact Area?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	4. Does application include operations in hydrologic basins other than as currently approved?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	5. Does application result from cancellation, reduction or increase of insurance or reclamation bond?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	6. Does the application require or include public notice/publication?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	7. Does the application require or include ownership, control, right-of-entry, or compliance information?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	8. Is proposed activity within 100 feet of a public road or cemetery or 300 feet of an occupied dwelling?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	9. Is the application submitted as a result of a Violation? NOV # _____
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	10. Is the application submitted as a result of other laws or regulations or policies? Explain: _____
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	11. Does the application affect the surface landowner or change the post mining land use?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	12. Does the application require or include underground design or mine sequence and timing? (Modification of R2P2?)
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	13. Does the application require or include collection and reporting of any baseline information?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	14. Could the application have any effect on wildlife or vegetation outside the current disturbed area?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	15. Does application require or include soil removal, storage or placement?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	16. Does the application require or include vegetation monitoring, removal or revegetation activities?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	17. Does the application require or include construction, modification, or removal of surface facilities?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	18. Does the application require or include water monitoring, sediment or drainage control measures?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	19. Does the application require or include certified designs, maps, or calculations?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	20. Does the application require or include subsidence control or monitoring?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	21. Have reclamation costs for bonding been provided for?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	22. Does application involve a perennial stream, a stream buffer zone or discharges to a stream?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	23. Does the application affect permits issued by other agencies or permits issued to other entities?

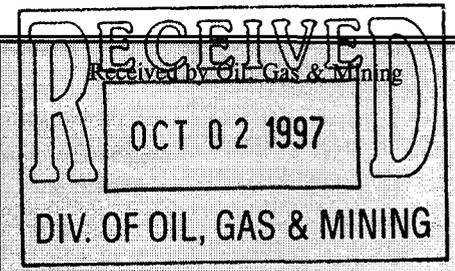
Attach 7 complete copies of the application.

I hereby certify that I am a responsible official of the applicant and that the information contained in this application is true and correct to the best of my information and belief in all respects with the laws of Utah in reference to commitments, undertakings, and obligations, herein. (R645-301-123)

Signed - Name - Position - Date
Charles A. Semborski Geology/Permitting Supervisor
 Signed - Name - Position - Date
Barbara J. Adams Notary Public
 Subscribed and sworn to before me this 27th day of Sept, 19 97

NOTARY PUBLIC
BARBARA J. ADAMS
 15 North Main
 Huntington, Utah 84528
 My Commission Expires
October 13, 2000

My Commission Expires: 10-13
 Attest: STATE OF UT
 COUNTY OF Emery



ASSIGNED TRACKING NUMBER

