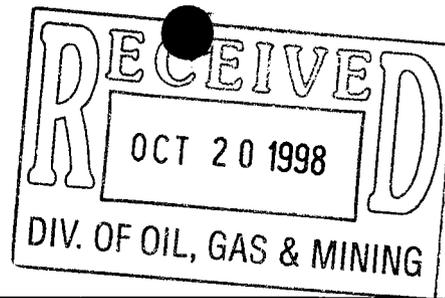


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October 16, 1998

Utah Coal Program  
Utah Division of Oil, Gas, and Mining  
Price Field Office  
College of Eastern Utah  
457 East 400 North  
Price, Utah 84501

ACT 1015/018 #2  
Daron

Attn: Pete Hess

**Re: Silt Fence Removal Request for the Rilda Canyon Fan Area, PacifiCorp, Deer Creek Mine, ACT/015/018, Emery County, Utah**

PacifiCorp, by and through its wholly-owned subsidiary, Energy West Mining Company ("Energy West") as mine operator, hereby requests permission from the Division of Oil, Gas and Mining to remove the silt fence positioned along the access road to the Rilda Canyon Fan.

### Introduction

Construction of the Rilda Canyon Fan access road and surface facilities occurred in the spring and summer months of 1995. During construction activities, a silt fence was placed along the outslope on the southeast side of the access road to provide erosion control until a vegetative cover could be established. Although the silt fence was never incorporated into the Deer Creek MRP, the removal request is warranted by Utah Coal rule R645-301-356.300 which states, "*Silt structures will be maintained until removal is authorized by the Division and the disturbed area has been stabilized and revegetated. In no case will the structure be removed sooner than two years after the last augmented seeding.*" The area has been stabilized and revegetated to the standards outlined in R645-301-353. A map\* showing the location of the extent of the siltation structure is provided in Attachment A.

As precipitation is a concern with any reclamation project, the access road area was designed to direct runoff from two areas; 1) the roadway, and 2) the undisturbed area adjacent to the road.

\*Please note that the alterations made to the approved permit map are only used to illustrate the extent of the silt fence to be removed, and will not become part of the map. These alterations will be eliminated when the removal of the silt fence is authorized.

Huntington Office:  
(435) 687-9821  
Fax (435) 687-2695  
Purchasing Fax (435) 687-9092

Deer Creek Mine:  
(435) 687-2317  
Fax (435) 687-2285

Trail Mountain Mine:  
(435) 748-2140  
Fax (435) 748-5125

These areas reports to a drainage ditch that runs along the northwest side of the road. The ditch design directs runoff from a 10yr/24hr event through three culverts (see map) to the undisturbed canyon drainage system. The culverts were adequately designed to convey runoff from a similar event. The outslope of the road is an isolated area. No other runoff, other than from the outslope itself, flows over the outslope of the road. This design minimized contributions of sediment from the outslope from entering the undisturbed canyon drainage system.

From the time of construction until now, vegetation has established along the outslope and appears to be adequate to provide erosion control without the silt fence. For the determination of vegetative success, Energy West contracted Dr. Patrick Collins to conduct a quantitative study of the area. This study occurred during the summer of 1998 and a report of his findings are found in Attachment B.

### **Summary of Findings**

Collins compared the outslope of the road to a Aspen/Fir/Dogwood reference area sampled in 1990. His methodologies of sampling the two areas were consistent even though the years sampled were different. He found that the total living cover of the two areas were similar, only varying in the amount of understory and overstory. The reference area was dominated by trees and shrubs while the reseeded area of the road outslope was dominated by grasses and forbs. It is Dr. Collin's professional opinion that grasses and forbs provide better erosional control than the tree and shrub community, therefore, he stated that erosion of the road outslope "should not be a significant problem in the reseeded area."

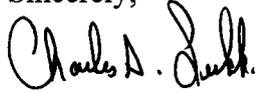
### **Conclusion**

It is Energy West's intention to remove the silt fence along the Rilda Canyon access road as soon as possible so removal will not be delayed by snow fall. The removal of the silt fence is rationalized by the study provided by Collins and requirements of the Utah Coal Rules. As mentioned a map of the surface facilities at Rilda Canyon is provided along with a quantitative study conducted by Dr. Patrick Collins. Please review this information without hast so the outlined goals can be accomplished.

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If you have any questions or concerns about removing the said silt fence, please feel free to contact me at (435) 687-4720 or Dennis Oakley at (435) 6874825.

Sincerely,



Chuck Semborski  
Geology/Permitting Supervisor

DCO/dco

enclosures - Rilda Canyon Surface Facilities Map  
- Plant Cover Comparisons: Roadway Slopes vs. Reference Area in Rilda Canyon,  
1998

cc: Daron Haddock (DOGM, w/enclosures) ✓  
Blake Webster (IMC, w/o enclosures)  
Carl Pollastro (EWMC, w/o enclosures)  
Dennis Oakley (EWMC, w/enclosures)