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

10274

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April 1, 2000

TO: Internal file
THRU: Robert Davidson, Reclamation Specialist **RAD**
RE: Permit Drawings Revision, PacifiCorp, Deer Creek Mine, ACT/015/018-00A

SUMMARY:

The Division received an amendment to update two maps in the Mining and Reclamation Plan (MRP). This Technical Memo primarily covers review of the Soils aspects of the submittal and is not all-inclusive. There are deficiencies resulting from the review.

TECHNICAL ANALYSIS:

OPERATION PLAN

TOPSOIL AND SUBSOIL

Regulatory Reference: 30 CFR Sec. 817.22; R645-301-230.

Analysis:

The submittal consists of two maps, 3-9 Deer Creek Mine Surface Yard Map DS202E, and 2-17, Deer Creek Coal Mine, Mine Plan Area Soils Map CM-10344-DR. Both are certified by a Registered Engineer. The accompanying cover letter indicates the new maps were submitted to represent current conditions at the Deer Creek Mine. Drawing CM 10344 DR will replace a blue-lined copy of a 1980 air photo since the 1980 photo does not accurately depict the surface facilities that currently exist. The letter indicates the additions and deletions on each of the revised drawings.

Drawing CM 10344 DR also includes 18 "DC" terrace enhancement project sample locations. However, the amendment contains no information concerning these samples. In order to approve this drawing with the added "DC" sample locations, the submittal needs to include current information to amend the MRP concerning the "DC" sampling, including project description, methodology, sample results, raw laboratory data sheets, field information, and who conducted the sampling.

Findings:

Information provided in the application is not considered adequate to meet the requirements of this section of the regulations. The applicant must provide the following in accordance with:

R645-301-120, R645-301-130, and R645-301-150, Include current information to amend the MRP concerning the "DC" sampling project, including project description, methodology, sample results, raw laboratory data sheets, field information, and who conducted the sampling.

RECLAMATION PLAN

TOPSOIL AND SUBSOIL

Regulatory Reference: 30 CFR Sec. 817.22; R645-301-240.

Analysis:

The amendment explains that PacifiCorp recently submitted a revised reclamation plan for the Deer Creek Mine. As explained, future sampling of the refuse piles in the Deer Creek and Elk canyons will be conducted at reclamation time; and therefore, proposed sampling locations have been included on Drawing CM 10344 DR. These proposed sampling sites have not been approved by the Division since the recently submitted revised reclamation plan for Deer Creek Mine is not approved. Therefore, it is premature to include these sample locations on Drawing CM 10344 DR since the Division cannot approve these locations without a complete review and analysis of the revised reclamation plan.

The "SS" sampling locations outlined in the existing MRP (Volume 2, Part 4, pg. 4-24 thru 4-25) have been deleted off Drawing DS 202 E. However, the submittal needs to include amended information for the MRP deleting any reference and discussion concerning the "SS" sampling locations. Since a revised sampling/exploration program is currently under review with

the recent revised reclamation submittal and is not yet approved by the Division, it is premature to delete the "SS" sample locations from Drawing DS 202 E. Therefore, the Division cannot approve the deletion of the "SS" sample locations until the revised reclamation plan is approved.

Findings:

Information provided in the application is not considered adequate to meet the requirements of this section of the regulations. The applicant must provide the following in accordance with:

R645-301-120 and R645-301-150, Prior to approval of the revised reclamation plan, the Division cannot approve at this time either the addition of proposed refuse sampling locations on Drawing CM 10344 DR or deletion of the "SS" sampling locations on Drawing DS 202 E.

RECOMMENDATION

The amendment application should not be accepted until the above deficiencies have been adequately addressed by the applicant