



February 14, 2001

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

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2/15/01

Attn: Daron Haddock

**Subject: Response to Deficiencies in the Permit Renewal Application, PacifiCorp, Deer Creek Mine, C/015/018-RN00, Emery County, Utah.**

PacifiCorp, by and through its wholly-owned subsidiary, Energy West Mining Company ("Energy West") as mine operator, hereby submits responses to the deficiencies of the Five-Year Permit Renewal - Completeness Determination package, dated November 15, 2000. Publication of the public notice commenced November 21, 2000 and was advertised for four (4) consecutive weeks as required.

R645-301-100: General Contents (formerly Part 1) is being amended as part of the deficiencies received on November 21, 2000. Attached with this document are four (4) review copies (redline/strikeout procedures were omitted since the entire chapter has been updated) of R645-301-100: General Contents, revised Table of Contents, and the required C1/C2 forms. Responses to the deficiencies are addressed below. If you have any questions or concerns regarding this document, please contact myself at (435) 687-4720 or Dennis Oakley at (435) 687-4825.

Sincerely,

Chuck Semborski  
Permitting/Geology Supervisor

Enclosure: Response to Technical Analysis Deficiencies  
Deer Creek MRP, Chapter 1w/appendices  
Table of Contents  
C1/C2 Forms

Cc: Carl Pollastro  
Chuck Semborski  
Dennis Oakley  
File

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## Response to Technical Analysis Deficiencies

The following responses to deficiencies are formatted as found in the technical analysis document. They are broken down into logical section headings similar to the R645 regulations. In each section, the regulation number along with the associated deficiency is followed by the permittee's italicized response.

### General Contents

#### Identification of Interests

**R645-301-112.320**, Part 1, Legal, Financial, Compliance must be updated with corporate ownership and structure information to include New Scottish Power, Scottish Power, Scottish Power NA1 and Scottish Power NA2 and the General Partnership.

*R645-301-100: General Contents (formerly Part 1) has been completely reformatted to include the requested ownership and control information. A flow diagram has been added to show the corporate structure of Scottish Power and PacifiCorp. An officer and director list of Scottish Power structure is included and updated as of December, 2000. Appendices have been incorporated into the section for all information that changes frequently.*

**R645-301-112.400 et. seq.**, Part 1, Legal, Financial, Compliance must be updated with corporate ownership and structure information to include any coal mining and reclamation operation owned or controlled by either the applicant or by any person who owns or controls the applicant.

*As stated in the above deficiency response, this information is complete and incorporated into R645-301-100: General Contents (formerly Part 1).*

#### Violation Information

**R645-301-123**, the notarized signature of a responsible official of the applicant, stating that the information contained in the application is true and correct to the best of the official's information and belief.

*The required C1/C2 forms are included as part of the Deer Creek MRP amendment.*

## APPLICATION FOR PERMIT PROCESSING

<input checked="" 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: <b>C/015/018</b>
Title of Proposal: Response to the Deficiencies in the Permit Renewal Application, Deer Creek Mine, C/015/018-RN00, Emery County, Utah.						Mine: <b>Deer Creek Mine</b>
						Permittee: <b>PacifiCorp</b>

Description, include reason for application and timing required to implement: This amendment is to update ownership and control information in the MRP. According to R645-303-220 the Division has 15 day to respond and 60 days to approve or disapprove.

**Instructions:** If you answer yes to any of the first 8 questions (gray), this may be a Significant Revision and require Public Notice. Any questions, please call a Permit Supervisor.

<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 checked="" type="checkbox"/> Yes	<input 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 type="checkbox"/> Yes	<input checked="" 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 4 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.

Charles A. Semborski Charles A. Semborski Geology/Permitting Supervisor 2/14/2001  
Signed - Name - Position - Date

Subscribed and sworn to before me this 14<sup>th</sup> day of February, 2001.

Lori Ann Anderson  
Notary Public

My Commission Expires: 12/22, 2001 }  
Attest: STATE OF Utah } ss:  
COUNTY OF Emery }

Received by Oil, Gas & Mining

**F B O 2001**

DIVISION OF  
OIL, GAS AND MINING

ASSIGNED TRACKING NUMBER

