

July 16, 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

Amgall-4  
[Redacted]

**Attn:** Daron Haddock

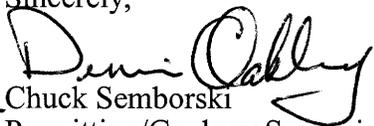
**Subject: Response to Deficiencies in the Revised Reclamation Plan - Round Four, PacifiCorp, Deer Creek Mine, A [Redacted] 199C-3, Emery County, Utah**

PacifiCorp, by and through its wholly-owned subsidiary, Energy West Mining Company ('Energy West') as mine operator, hereby submits round four responses to the deficiencies of the revised Deer Creek reclamation plan. The revised plan was initially submitted in May, 1999. The Division received the third round of deficiency responses in March, 2001 and sent out their technical analysis dated May 18, 2001.

The attached document attempts to answer the deficiencies in the order they were received. The Division's findings will be first listed by regulation and explanation. PacifiCorp will follow by a response in *italics*.

Accompanied with this letter are two (2) copies of the reclamation plan for your Round Five Review process. 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,

*for*   
Chuck Semborski  
Permitting/Geology Supervisor

Enclosure: Response to Technical Analysis Deficiencies - Round Four  
Deer Creek Revised Reclamation Plan - Round Five Review

Cc: Carl Pollastro  
Chuck Semborski  
Dennis Oakley  
File

## Response to Technical Analysis Deficiencies - Round Four

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.

### Reclamation Plan

#### Approximate Original Contour Restoration

**R645-301-553.100 and R645-301-121.200**, The cross-sections for Section A-A' and Section B-B', on Drawing DS1784D do not match the contour lines on the Drawing DS1782D. The applicant must determine which drawing is correct and make the necessary correction. See the *Deer Creek* subsection in this analysis for more details.

*The cross-sections A-A' and B-B' on drawing DS1784D represent in-place fill material from DS1796D and are referenced on each drawing. The cross-sections shown on DS1782D have been removed. This change should clear up any confusion that the Division might have with these cross-sections.*

**R645-301-542.200**, The applicant must give the Division detailed topographic maps and cross sections for the 9<sup>th</sup> East North Meetinghouse Portals. The drawing must show the location of highwalls (if they exist) and other features that show the site meets AOC requirements.

*A reclamation plan has been developed for the 9<sup>th</sup> East North Meetinghouse Canyon portals. Detailed cross-sectional maps have been developed which show pre- and post-reclamation of the area.*

#### Backfilling and Grading

**R645-301-542.200 and R645-301-521.110**, The applicant must give the Division a reclamation plan for the 9<sup>th</sup> East North Meetinghouse Portals. The reclamation must also include the location of all pre law sites surrounding the 9<sup>th</sup> East North Meetinghouse Portals.

*As mentioned above, a reclamation plan has been developed for the 9<sup>th</sup> East North Meetinghouse Canyon portals. Pre-law sites nearby the said portals have been included on drawing DS1798C. This drawing has been scaled to include these areas. The reclamation plan and revised map are included with this submittal.*

#### Mine Openings

**R645-301-551**, The applicant must give the Division portal closure plans for North Fork Meetinghouse Canyon.

*This deficiency has been previously discussed and will not be repeated here.*

## **Topsoil and Subsoil**

**R645-301-240**, Map DS-1782-D does not show soil being placed over all of the disturbed area, and the application needs to explain why this is the case or else provide substitute topsoil cover over the entire disturbed area.

*The actual drawing showing substitute topsoil placement is DS1816D. This drawing has been noted to explain substitute topsoil placement and cross-referenced with Drawing DS1783D, 1 & 2. Drawing DS1783D, 1&2 has also been cross-referenced to DS1816D. These changes should clear up any confusion of substitute topsoil placement. Amended drawings are included with this submittal.*

## **Hydrologic Information**

**R645-301-121.200**, On page 7-3, the application says the estimation of the K-factor was based on average percentages of sand, silt, and clay from the soil analysis in Appendix R645-301-200-D: This should be Appendix R645-301-200-C.

*This error has been noted and corrected in the revised reclamation plan, page 7-3. Redline/strikeout copies are included with this submittal.*

**R645-301-742.312**, The applicant states in the cover that they will perform sieve analyses or similar analyses in conjunction with the construction of the bioengineered channels. The applicant also says more detailed information has been added to the Bioengineered Channels Section to help the reader better understand the construction process; the additional information and the commitment to sieve analyses could not be found in the Hydrology Section.

*The commitment to conducting sieve analysis has been added to R645-301-700: Hydrology under Bioengineered Channels. The commitment is redlined and included with this submittal.*

## **Maps, Plans, and Cross-Sections of Reclamation Operations**

**R645-301-542.00**, The applicant must submit backfilling and grading maps for the 9<sup>th</sup> East North Meetinghouse Portals areas before the Division can approve the reclamation plan.

*This deficiency has been previously discussed and will not be repeated here. Portal cross-sections are included with the 9<sup>th</sup> East North Meetinghouse Canyon reclamation plan found in Appendix R645-301-500-B*

## **Bonding and Insurance Requirements**

**R645-301-830.130**, The applicant did not include a detailed reclamation cost estimate in the amendment. The applicant informed the Division that the reclamation cost estimate would not be submitted until the reclamation plan was approved. The Division agreed to that procedure. Prior to final approval the applicant must submit a detailed cost estimate.

*This procedure is still agreeable to Energy West.*

# 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: C/015/018
Title of Proposal: Amendment to Revise Deer Creek Reclamation Plan, Deer Creek Mine, PacifiCorp, C/015/018, Emery County, Utah						Mine: DEER CREEK
						Permittee: PACIFICORP

Description, include reason for application and timing required to implement: Revised plan to reflect final reclamation completed in December 1999.

**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 checked="" type="checkbox"/> Yes	<input 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 checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	15. Does application require or include soil removal, storage or placement?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	16. Does the application require or include vegetation monitoring, removal or revegetation activities?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	17. Does the application require or include construction, modification, or removal of surface facilities?
<input checked="" type="checkbox"/> Yes	<input 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 checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	21. Have reclamation costs for bonding been provided for?
<input checked="" type="checkbox"/> Yes	<input 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 2 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)

Charles A. Semborski Signed - Name - Position - Date 7/16/2001  
 Charles A. Semborski - Geology/Permitting Supervisor

Subscribed and sworn to before me this 16 day of July, 2001.

Jarildan Anderson  
 Notary Public  
 My Commission Expires: 12/22, 2001  
 Attest: STATE OF Utah )  
 COUNTY OF Emery ) ss:

Received by Oil, Gas & Mining     ASSIGNED TRACKING NUMBER
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