

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

December 15, 2003

TO: Internal File

THRU: Daron Haddock, Permit Supervisor

FROM: Priscilla Burton

RE: Minor Coal Exploration:Geotechnical Investigation, PacificCorp, Deer Creek Mine, C/015/0018, Task #1779.

SUMMARY and RECOMMENDATIONS:

Energy West Mining Corporation dug several back hoe pits in August 2003 to obtain soils information. That soils information was not included with the initial submittal of Task #1766 Replacement of Volume 11 (Rilda Cyn Facilities). Consequently, the format of this technical review is abbreviated due to the lack of available information.

The Notice of Intention to Conduct Minor Coal Exploration:Geotechnical Investigation, Federal Coal Leases: SL-051221 and U-2810 (Rilda Cyn Surface Facilities), received December 5, 2003 (Task # 1779) indicates on page 1 that the exploration plan review will be the responsibility of the Division, however, the Division has delegated this responsibility to the BLM under the auspices of coal exploration. This delegation may have been done without full appreciation of the type of information to be gathered from the backhoe pits. The pits will provide valuable environmental resource information that is currently lacking in Task #1766, such as depth to groundwater and information on stream laid deposits. The Division should request that all information gained from the geotechnical investigation is included for review under Task #1766 to broaden the Division's understanding of the soils resource and to assist in the determination of the probable existence of an alluvial valley floor.

The submittal under review in Task #1779 indicates that Energy West Mining Corp will dig between six and twenty more pits to a depth of up to twenty feet to further:

- characterize and evaluate subsurface soil, bedrock, and groundwater conditions at the site;to evaluate the site geoseismic setting; and
- to make geotechnical recommendations for earthwork and construction.

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Twenty pits seems an excessive number, especially given that in August 2003, the Forest Service was extremely concerned about locating too many soil pits in the canyon bottom. Justification for more than one pit in an area should be requested (areas are designated on page 5). A requirement for documentation of field decisions to create more than one pit should be written into the plan.

On page 8, the plan indicates that topsoil will be separately removed as necessary or as required by the Division. No mention of depths of soil salvage was made for the specific areas to be disturbed (listed on page 5). The Permittee should use information from the five pits dug for the August soil survey to provide a specific estimate of the depth of topsoil to be removed and stockpiled at all pit locations (see page 5 for specified areas). This depth of recovery should be written into the plan.

No mention is made of gouging the surface to promote soil stability or to prevent erosion (pages 9 – 11). The plan should include a method of soil stabilization.

The coal exploration does not give the Permittee license to compact undisturbed ground with vehicle traffic or otherwise affect the undisturbed or reclaimed areas.