

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

October 27, 2004

TO: Internal File

THRU: Wayne Hedberg, Permit Supervisor *WH*

FROM: James D. Smith, Environmental Specialist *DS*

RE: Vehicular Use Restrictions in Rilda Canyon, PacifiCorp, Deer Creek Mine, Permit # C/015/0018, Task # 2086

SUMMARY:

In August, USFS personnel witnessed a truck delivering concrete to the Rilda Canyon facilities in the Left Fork of Rilda Canyon. When the driver was questioned as to whether the mine permit allowed such deliveries, the driver referred the question to Chuck Semborski of Energy West Mining Company. Upon review of the permit and MRP, it wasn't clear that such deliveries were allowed. Mr. Semborski contacted both the Division and USFS for permission to continue concrete deliveries, because transport from the Deer Creek Mine portals was not an option due to the distance and, more importantly, the time from the portals to the underground work site: the aggregate would settle and the cement begin to set during the slow underground trip.

Permission was granted by both agencies to allow concrete deliveries to finish the project. Future projects in the Mill Fork Extension will also require concrete. Energy West committed to amend the MRP to specify concrete delivery to the Rilda Canyon facilities. (If proposed new portal facilities are built just below the junction of the Left and Right Forks of Rilda Canyon, there will no longer be a need for deliveries through the current Rilda Canyon facilities, and the entire section dealing with deliveries and traffic to these portals will be removed from the MRP.)

The Division received the proposed amendment on October 6, 2004. The amendment adds *Concrete* and *Mixer* (i.e., concrete truck) to the table showing materials and vehicles allowed at the Rilda Canyon facilities in the Left Fork.

The proposed amendment should be approved. It is also recommended that the Master TA for the Deer Creek Mine does not need to be updated for this minor amendment.

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TECHNICAL ANALYSIS:

OPERATION PLAN

MINING OPERATIONS AND FACILITIES

Regulatory Reference: 30 CFR 784.2, 784.11; R645-301-231, -301-526, -301-528.

Analysis:

The amended plan specifies that *Mixer* (i.e., concrete truck) is a vehicle type allowed to use the road in the Left Fork of Rilda Canyon to access the Rilda Canyon support facilities (fan and access portals) and that *Concrete* is included in the Gravel Products category of materials that can be delivered there.

Entry of materials and equipment into the Deer Creek Mine by way of the road in the Left Fork and through the Rilda Canyon access portal is already covered under Mining Operations and Facilities in the latest Deer Creek Mine Master TA dated March 3, 2003.. That TA's finding of compliance with R645-302-526 remains unchanged.

Findings:

The Mining Operations and Facilities information meets the requirements of the R645 Rules.

RECOMMENDATIONS:

The proposed amendment should be approved.

The Master TA for the Deer Creek Mine does not need to be updated for this minor amendment.