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From: Dale Harber <dharber@fs.fed.us>
To: <joehelfrich@utah.gov>, <joehelfrich@utah.gov>
Date: 2/15/2005 10:38:19 AM
Subject: Fw: Response to Deficiencies in the Deer Creek Mine, Volume 11 Replacement, PacifiCorp, Deer Creek Mine, C015/018, Task ID 2032

Joe:

I heard on the conference call this morning that Wayne is out of town this week, so I am sending this to you. Let me know if I need to send it to anyone else.

Dale

----- Forwarded by Dale Harber/R4/USDAFS on 02/15/2005 10:31 AM -----

Dale Harber/R4/USDAFS
02/14/2005 04:35 PM

To: waynehedberg@utah.gov
cc: Dale Harber/R4/USDAFS@FSNOTES
Subject: Response to Deficiencies in the Deer Creek Mine, Volume 11 Replacement, PacifiCorp, Deer Creek Mine, C015/018, Task ID 2032

Wayne:

Here are our comments on the Rilda Canyon Surface Facilities.

Dale

(See attached file: mrp_response_02_14_2005.doc)

CC: Dale Harber <dharber@fs.fed.us>

Subject: Response to Deficiencies in the Deer Creek Mine, Volume 11 Replacement, PacifiCorp, Deer Creek Mine, C015/018, Task ID 2032, Emery County, Utah

The following are comments from the Manti-La Sal National Forest on the replacement Volume 11:

Soils Section, R645-301-200

Page 19, R645-301-242, Soil Redistibution, first paragraph.

The statement that soil material will be redistributed to be consistent with the postmining land use of the area is too vague. The statement should be that they will use the soil to restore the approximate original surface contour of the area.

Page 26, R645-302-216, page 26.

PacifiCorp must describe how they will "conduct the periodic monitoring, recording and reporting program" on the experimental practice, as required under R645-302-216. This does not appear to actually be an experimental practice, as PacifiCorp claims to have used the practice successfully in Cottonwood Canyon and at the Des-Bee-Dove mines.

Engineering Section, R645-301-500

Materials Storage Areas, last paragraph, page 10.

Describe what storage areas will have asphalt or concrete surfaces, and what materials will be stored, so the potential for groundwater contamination can be evaluated.

Culinary Water Storage Tank, page 12.

Describe the source of the culinary water. If it is coming from within Rilda Canyon, it may be a significant impact to water resources.

R645-301-526.200, Utility Installation and Support Facilities, page 34.

Describe whether the proposed spring collection system in the Right Fork of Rilda Canyon is planned to be a replacement for the current collection system, or would be a back-up. If the spring collection system in the Right Fork of Rilda Canyon will be a replacement, describe what will be done with the current collection system.

R645-301-541.300, Structure Removal, last paragraph, page 42.

The statement that the asphalt material from the parking lot will be removed and taken to a permitted landfill should be changed to read that <u>all</u> asphalt material will be removed and taken to a landfill. No asphalt may be disposed of on

National Forest System lands.

Hydrology section, R645-301-700

Aquifer Characteristics, second paragraph, page 19.

The first two sentences of this paragraph describe the three sources of groundwater moving through Rilda Canyon. This is important information, so the source should be cited.

C. Increased Salinity in Rilda Creek, pages 45-46.

There is only a brief discussion of using salt on the county road between Highway 31 and the portal facilities area, with no mention of impacts to the creek. The company needs to describe the expected impacts to the creek due to using salt on the road.