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Huntington, Utah 84528

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For additional information

May 31, 2005

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

Subject: **Response to Deficiencies in the Deer Creek Mine, Volume 11 Rilda Canyon Portal Facilities, PacifiCorp, Deer Creek Mine, C015/018, Task ID 2093, 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 Deer Creek Mine, Volume 11 Rilda Canyon Portal Facilities amendment (refer to attached chronology related North Rilda amendment process). PacifiCorp appreciates the cooperation of the Division's technical staff to correct the identified deficiencies.

Energy West received the Technical Analysis document on May 10, 2005. This document found the amendment application contained deficiencies to the Utah R645 Coal Regulations. Attached with this document are the permittee's responses to the deficiencies accompanied with amended volumes to the permit. Six (6) copies are attached as required along with the required C1/C2 forms for the correct placement of the amended text into the MRP.

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,

Charles A. Semborski
Manger Permitting/Geology

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Enclosure: Response to Technical Analysis Deficiencies
C1/C2 Forms
Cc: Doug Johnson (EWMC, w/o encl.)
File

DIV. OF OIL, GAS & MINING

Huntington Office:
(435) 687-9821
Fax (435) 687-2695
Purchasing Fax (435) 687-9092

Deer Creek Mine:
(435) 687-2317
Fax (435) 687-2285

APPLICATION FOR COAL PERMIT PROCESSING

Permit Change New Permit Renewal Exploration Bond Release Transfer

Permittee: PacifiCorp

Mine: Deer Creek Mine

Permit Number: C/015/018

Title: Volume 11: Response to deficiencies, Task ID#2195, PacifiCorp, Deer Creek Mine, C015/018

Description, Include reason for application and timing required to implement:

Revised text and maps in response to deficiencies received on May 10, 2005

Instructions: If you answer yes to any of the first eight (gray) questions, this application may require Public Notice publication.

- Yes No 1. Change in the size of the Permit Area? Acres: _____ Disturbed Area: 13.1 increase decrease.
- Yes No 2. Is the application submitted as a result of a Division Order? DO# _____
- Yes No 3. Does the application include operations outside a previously identified Cumulative Hydrologic Impact Area?
- Yes No 4. Does the application include operations in hydrologic basins other than as currently approved?
- Yes No 5. Does the application result from cancellation, reduction or increase of insurance or reclamation bond?
- Yes No 6. Does the application require or include public notice publication?
- Yes No 7. Does the application require or include ownership, control, right-of-entry, or compliance information?
- Yes No 8. Is proposed activity within 100 feet of a public road or cemetery or 300 feet of an occupied dwelling?
- Yes No 9. Is the application submitted as a result of a Violation? NOV # _____
- Yes No 10. Is the application submitted as a result of other laws or regulations or policies?
Explain: _____
- Yes No 11. Does the application affect the surface landowner or change the post mining land use?
- Yes No 12. Does the application require or include underground design or mine sequence and timing? (Modification of R2P2)
- Yes No 13. Does the application require or include collection and reporting of any baseline information?
- Yes No 14. Could the application have any effect on wildlife or vegetation outside the current disturbed area?
- Yes No 15. Does the application require or include soil removal, storage or placement?
- Yes No 16. Does the application require or include vegetation monitoring, removal or revegetation activities?
- Yes No 17. Does the application require or include construction, modification, or removal of surface facilities?
- Yes No 18. Does the application require or include water monitoring, sediment or drainage control measures?
- Yes No 19. Does the application require or include certified designs, maps or calculation?
- Yes No 20. Does the application require or include subsidence control or monitoring?
- Yes No 21. Have reclamation costs for bonding been provided?
- Yes No 22. Does the application involve a perennial stream, a stream buffer zone or discharges to a stream?
- Yes No 23. Does the application affect permits issued by other agencies or permits issued to other entities?

Please attach four (4) review copies of the application. If the mine is on or adjacent to Forest Service land please submit five (5) copies, thank you. (These numbers include a copy for the Price Field Office)

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.

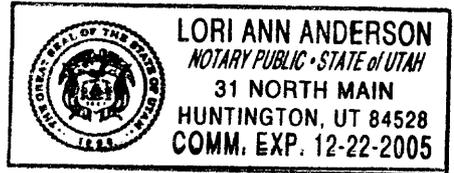
Charles A. Semborski
Print Name

Charles A. Semborski Geology/Permitting Supervisor 6-01-05
Sign Name, Position, Date

Subscribed and sworn to before me this 1st day of June, 2005

Lori Ann Anderson
Notary Public

My commission Expires: _____
Attest: State of Utah 12/22, 2005) ss:
County of Emery



For Office Use Only: 	Assigned Tracking Number:	Received by Oil, Gas & Mining <div style="text-align: center; font-size: 1.2em; font-weight: bold;"> RECEIVED JUN 02 2005 DIV. OF OIL, GAS & MINING </div>
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APPLICATION FOR COAL PERMIT PROCESSING

Detailed Schedule Of Changes to the Mining And Reclamation Plan

Permittee: PacifiCorp

Mine: Deer Creek Mine

Permit Number: C/015/018

Title: Volume 11: Response to Deficiencies, Task ID#2195, PacifiCorp, Deer Creek Mine, C015/018

Provide a detailed listing of all changes to the Mining and Reclamation Plan, which is required as a result of this proposed permit application. Individually list all maps and drawings that are added, replaced, or removed from the plan. Include changes to the table of contents, section of the plan, or other information as needed to specifically locate, identify and revise the existing Mining and Reclamation Plan. Include page, section and drawing number as part of the description.

DESCRIPTION OF MAP, TEXT, OR MATERIAL TO BE CHANGED

** TEXT SECTION **

<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	Volume 11, R645-301-200 Soils Section, replace entire section
<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	Volume 11, R645-301-300 Biology Section, replace entire section
<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	Volume 11, R645-301-500 Engineering Section, replace entire Section
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** MAPS **

<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	Volume 11 Appendix Volume, Map 200-1
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<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	Volume 11 Land Use and Air Quality, Map 400-1
<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	Volume 11 Engineering, Figures, figure R645-301-500c
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<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	Volume 11 Engineering, Map 500-3
<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	Volume 11 Engineering, Map 500-5
<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	Volume 11 Geology, Map 600-1
<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	Volume 11 Appendix Volume – Hydrology: Appendix B, Map 700-1
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** APPENDIX VOLUME **

<input checked="" type="checkbox"/> Add	<input type="checkbox"/> Replace	<input type="checkbox"/> Remove	Volume 11 Appendix Volume – Soils: Appendix B, Add Addendum Soil Storage Survey
<input checked="" type="checkbox"/> Add	<input type="checkbox"/> Replace	<input type="checkbox"/> Remove	Volume 11 Appendix Volume – Engineering: Appendix G, Rilda Canyon Road – Change Order No. 1, Add CD Diskette page
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Any other specific or special instruction required for insertion of this proposal into the Mining and Reclamation Plan.

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Form DOGM - C2 (Revised March 12, 2002)

CHRONOLOGY OF NORTH RILDA CANYON PORTAL FACILITIES

- + July 1997, PacifiCorp received approval to expand its mining operations to include the North Rilda Area.

- + PacifiCorp acquired the Mill Fork Lease and entered into a COAL MINING LEASE AND AGREEMENT with the State of Utah on April 1, 1999. The coal tract as described in the lease contains approximately 5,562.82 acres, more or less. With the leasing of the Mill Fork Tract in 1999, PacifiCorp controls through ownership and leasing certain fee coal lands together with assigned federal coal leases nearly 30,000 acres of contiguous minable property located in Emery County, Utah. PacifiCorp submitted an application to include the Mill Fork Lease within the Deer Creek Mine permit in November 2001. The application was approved on March 5, 2003. This expansion involved increasing the acreage of the Deer Creek permit by 5,562.82 acres. Because of the geographic location, the proposed new area of expansion is referred to as the "Mill Fork Permit Area", refer to Volume 12.

- + Mine plans were developed based on results of the coal exploration programs to access to the Mill Fork lease through a set of main entries developed in the Hiawatha seam driven in a westerly direction along the southern most lease boundary.

- + PacifiCorp evaluated long term options to improve overall underground transportation and economic considerations.
 - Options investigated included:
 - Acquisition of Crandall Canyon Mine
 - New portal facilities in Mill Fork Canyon
 - New portal facilities in Rilda Canyon
 - In-seam horizontal drilling was conducted to evaluate potential location of portal facilities.
 - As a result of extensive investigation, PacifiCorp selected Rilda Canyon as the best option based on the following:
 - Environmental Considerations
 - Facilities are located in an area previously disturbed by mining
 - Surface facilities are designed to accommodate men and materials only. Coal mined from the Hiawatha (lower) and Blind Canyon (upper) seams will continue to be shipped through the existing Deer Creek mine workings to the portal in Deer Creek Canyon. From this point, the coal will be transported to the Huntington Power Plant coal storage area via the existing overland beltline. Only surplus production beyond the Huntington Plant needs will be trucked on the highway from the plant.
 - Engineering Considerations
 - Facilities designed to minimize surface disturbance (only 13.1 acres of which 4.4 acres have been previously disturbed [roads and historical mining])

CHRONOLOGY OF NORTH RILDA CANYON PORTAL FACILITIES

Page Two

May 31, 2005

- Utilization of existing infrastructures (roads, powerline)
- + PacifiCorp submitted an application (Volume 11) on November 4, 2003 for a 10.2-acre facilities pad in Rilda Canyon for miners and materials access. The facilities were proposed in an area disturbed by previous mining operations. This application was withdrawn, largely because of anticipated problems in getting permits to place 1,500 feet of Rilda Creek into a large diameter culvert.
- + On September 2, 2004, the PacifiCorp submitted a revised application for the facilities pad area in a new location, approximately ½ mile farther up the canyon, near the intersection of the Right and Left forks of Rilda Canyon. Relocation of the facilities will not require culverting of the Rilda Creek.

The proposed North Rilda Portal Facilities consisted of two separate areas. The main facilities will consist of 9 acres, with an additional 3.13 acres (outside the current permit boundary) for soil and subsoil storage down the canyon, a total disturbed area of 12.13 acres. This will bring the total disturbed area for Rilda Canyon, including the Left Fork fan area, to 14.46 acres and total disturbed area for the Deer Creek Mine to 96.47 acres: the total permit area remains unchanged at 22,769.06 acres.

- + The Division responded with the Administrative Completeness Review on October 11, 2004 and followed up with the Technical Analysis document on October 19, 2004. The Division determined the application incomplete during there review and required Energy West to supply more detailed information.
- + During permit review meetings held on November 1-2, 2004, regulatory agencies requested that PacifiCorp review the current application and relocate the soil storage piles within the permit boundary utilizing areas previously disturbed by historic mining.
- + On December 6, 2004, to simplify revisions to Volume 11: Deer Creek Mine North Rilda Portal Facilities, PacifiCorp requested that the September 2, 2004 amendment be withdrawn from public record.
- + PacifiCorp, on December 21, 2004, re-submitted a completely revised application (Volume 11) for the Rilda Canyon Facilities with topsoil and subsoil piles located within the permit area.
- + On March 1, 2005, PacifiCorp received a list of deficiencies related to the December 21, 2004 submitted, which included U.S. Forest Service comments. Response to the deficiencies due by April 1, 2005.

CHRONOLOGY OF NORTH RILDA CANYON PORTAL FACILITIES

Page Three

May 31, 2005

- † On May 10, 2005, PacifiCorp received a list of deficiencies related to the April 1, 2004 submitted, which included U.S. Forest Service comments. Response to the deficiencies due by June 10, 2005.

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.

R645-301-121.200, (1) Clarify that the USGS macroinvertebrate data may supplement the surveys conducted during and after 2004 **(2)** Clarify that the Permittee will comply with the exclusionary period during construction and reclamation **(3)** Clarify the exclusionary period to either include the calving/fawning or remove the reference to calving (pp. 17, 26). [JAE]

(1) R645-301-322 Aquatic Species section has been revised to indicate that the USGS study would be used as a reference study in comparison to the baseline study conducted during 2004-2005.

(2) & (3) All references in Biology Section has been revised to comply with exclusionary period for both construction and reclamation activities.

R645-301-122, The Permittee must include a signed copy of the Agreement #2 that will allow a portion of Emery County Road 306 to be temporarily restricted to public use. [WHW]

Energy West is currently working with Emery County to establish Agreement #2 to suspend a portion of EC#306. A final copy has been drafted and is currently being reviewed for its legal content. We expect to have the document signed by mid June. As soon as the agreement is signed by both parties, it will be inserted into the MRP.

R645-301-122, The Permittee must provide the Division with an updated copy of the R2P2 or equivalent information, when that information becomes available. [WHW]

The R2P2 was updated and approved by the BLM on March 25, 2005. This information was included with the March 31, 2005 submittal as an attachment.

R645-301-200, There is an incorrect citation for the location of the topsoil storage pile cross-sections. The plan should indicate in section R645-301-231.100 (p. 12) that Map 500-4 Sheet 3 of 5 provides the stockpile cross-sections. [PWB]

References for the location of the topsoil storage pile cross sections have been corrected

R645-301-243, Reestablishment of microbial activity in stockpiled soil material usually occurs as a result of the addition of straw or hay and with seeding. The plan might encourage rapid establishment of locally adapted strains of microbes through the use of a slurry of native soil and water. The supernatant from this slurry could be added to the hydromulch for application to the soil. [PWB]

R645-301-243 Soil Nutrients and Amendments has been revised to include the following commitment:

To increase the fertility of the topsoil during reclamation, PacifiCorp will enhance the establishment of locally adapted microrhizomes by mixing 1 cubic foot of undisturbed topsoil from areas adjacent to the disturbed area to the hydroseeder prior to application. The supernatant from this slurry mixture will be applied to regraded topsoil during the reclamation process.

R645-301-356, Provide a NRCS 2004 evaluation of productivity and range condition for the previously mined site. Illustrate that surveyors conducted or will conduct the vegetation survey and NRCS evaluation within a normal precipitation year prior to disturbance. [JAE]

R645-301-321 has been revised to include the following statement:

Vegetation productivity analysis was conducted by M. Dean Stacy and Jim Brown of the Natural Resources Conservation Service (NRCS) in October 2004 (refer to Volume 11 Appendix Volume - Biology: Appendix B). The NRCS condition rating is 3 levels (Good, Fair, Poor), with sub-ratings of high and low. Though precipitation totals for the year were slightly below normal (85% of normal, based on East Mountain Weather Station data), the conditions of the reference areas were in the mid range (fair) condition. Productivity values for the communities to be impacted by the facilities are in the report.

R645-301-356.250, The Permittee must bring the cover to at least the percent of ground cover existing before redisturbance and adequate to control erosion. [JAE]

PacifiCorp has revised the reclamation revegetation commitments to meet the non-disturbed reference areas, this includes the previously disturbed areas.

Protection and Enhancement Plan

R645-301-322, -301-333, -301-342, -301-358, Volume 11, Page 300-16 procedure #1 The reduced footprint is a surface disturbance that includes the removal of coal and construction of a sediment pond that will displace current wintering big game species throughout the life of the facility. This procedure needs to be removed from the application.

Page 300-17 procedure #14; this sentence needs to include construction activities as well as reclamation activities.

Pages 300-17 and 18, table 300-5.

Commitment #1, The removal of coal will displace the current wintering big game species throughout the life of the facility. This commitment needs to be removed from the application. Commitments 2, 3 and 4 need to include detailed plans for implementation. The plans should be developed on cooperation with the Division of Wildlife Resources, The US Forest Service and the Division of Oil Gas and Mining. Any enhancement plan must include at least the overseeing agency or other group, general objective and location of the project, date of expected implementation and completion, and required reporting. [JCH]

R645-301-333, Provide supplemental information for the protection and enhancement plan. For example, the Division requires more information for the Leroy Mine, DWR timber harvest, raptor preybase, Rilda Creek, and East Mountain projects. The Permittee must include, where appropriate, proposed dates, overseeing agencies, and points on how the Permittee will participate (monetary, man power, etc.). [JAE]

Wetlands and Habitats of Unusually High Value for Fish and Wildlife

Volume 11, Pages 300-17 and 18 of the application for the proposed Rilda Canyon development area include four protection methods and general descriptions of three proposals for enhancement of big game species. By addressing the deficiencies outlined in the Protection and Enhancement Plan section (above), the Permittee will also meet the requirements of this section of the regulations. [JCH]

Protection and Enhancement Plan and Mitigation Commitments:

PacifiCorp completely revised the Protection and Enhancement and Wildlife Mitigation Commitments section to address the deficiencies cited above. Revisions to the plan were based on corporative meetings held with the United States Forest Service (surface land management agency), Utah Division of Wildlife Resources, United States Fish and Wildlife Service, and the Division of Oil, Gas and Mining.

R645-301-521.123 and R645-301-521.190, The Permittee must show the location of the Forest Service road that accesses the topsoil storage location on the reclamation, operational, and existing maps. [WHW]

All permit maps that show the location of this access road have been amended to identify the Forest Service road as FDR 024. Refer to C2 form for the affected maps.

R645-301-521.180 and R645-301-521.190, All items shown on Map 500-3 must be listed in Section 521.180, and the reverse must occur. Examples include, but are not limited to; the generator, transformer, fuel tank for generator, bunker for noncoal waste – sand storage – rock waste, gravel storage, covered storage, rock dust silo, fuel dock, pump station – generator, and trail parking area. [WHW]

In a phone conversation with Wayne Western, it was decided that although Section 521.180 was not in the format specifically preferred by the Division, it was written to include a discussion of all items on Map 500-3. Therefore, Section 521.180 has not been changed.

R645-301-521.133.1, The Permittee must list those measures that they will take to protect the public when mining and reclamation activities occur within 100 feet of a public road. Specific issues include protecting the public during mining and reclamation activities at the topsoil and subsoil storage areas and when the trailhead is reclaimed. Examples of methods to protect the public could include, but not be limited to; flag persons, warning signs, and barricades. [WHW]

PacifiCorp believes that the intent of the above stated regulation follows closer to a legal and financial point of view rather than a health and safety perspective. To interpret the full intent, one must look at the regulation from the beginning, i.e R645-301-521.130. In our opinion, the regulation clearly intends to protect public interest and not safety. The regulation goes on to refer the reader to R645-103-234 where the regulation requires applicants to obtain necessary approvals from authorities with jurisdiction of public roads, allows the opportunity for a public hearing, and so on.

Public safety is preserved with the approvals (i.e. road encroachment permits) and agreed upon contracts signed by the owner (permittee) and project contractor. The permits and contracts will specify that signing, flagging, barricading, etc, be used to protect public and control traffic.

No changes to this permit application has been made in association with this deficiency.

R645-301-521.124, The Permittee must show the location of the noncoal waste storage site on the operations map, Map 500-3. [WHW]

The non-coal waste storage is identified on Map 500-3. Please refer to this map for the location of the non-coal waste, sand, and waste rock bunker near the proposed mine ventilation fan.

R645-301-524.200 and R645-301-524.220, The Permittee must submit a blasting plan for each blast. The five-pound exemption only applies to preblast surveys (See R645-301-524.300.) [WHW]

R645-301-524.200 (pg. 22) has been changed to exclude the 5 pound specification for a shot. This sections now reads "Submittal of blast designs for shots will be made to the Division for approval prior to conducting surface blasting at the mine site. A schedule will be presented to the Division prior to conducting blasting activities. The blast design will be prepared and signed by a certified blaster".

R645-301-542.600, The Permittee must include a detailed plan for the realignment of Emery County Road 306 in the MRP. The agreement must specifically state whether the County or the Permittee will be responsible for doing the work. If the Permittee is responsible for the work, then plans for the realigned road must be included in the MRP. [WHW]

Designs have been converted into an ADOBE ACROBAT format and burned onto a CD. This CD is included in Volume 11 Appendix Volume - Engineering: Appendix G

R645-301-534.130, The Permittee must discuss how the road embankments will meet the 1.3 minimum safety factor requirement. [WHW]

A statement has been placed under R645-301-534: Roads on page 42 as follows:

"Since the primary road associated with the Rilda Canyon Portal facilities will be located on the facility pad, there will be no road embankments. Therefore, a static safety factor of 1.3 can be disregarded in this situation".

R645-301-528, The Permittee must include in the narrative a statement about the temporary storage of coal mine waste at the North Rilda Portal Facility. Specific issues that must be addressed are: (1) The Permittee must refer to the coal mine waste storage area as the rock waste site. This is what the facility is referred to in the rest of the MRP (see Section R645-301-536 of the MRP). (2) The maximum amount of time coal mine waste can be stored at the North Rilda Portal Facility. (3) The maximum volume/weight of material that can be stored on site. [WHW]

Map 500-3 has been changed to refer to the coal mine waste storage as "waste rock" instead of rock waste. The text has also been amended in Section R645-301-536: Coal Mine Waste as follows:

"A temporary waste rock storage facility is located on the surface at the Rilda Canyon portal facility in Rilda Canyon and noted on Map 500-3 as "Waste Rock". The capacity of the waste rock bunker is approximately 125 cu. yds. The waste rock will be hauled to the Deer Creek Waste Rock Site as the bunker reaches its capacity".

R645-301-830, The Permittee must submit adequate reclamation cost estimates and have adequate bond before the revision is approved. To avoid confusion, the Division recommends that the Permittee make a general comment that the reclamation cost estimates will be provided to the Division, before the revision is approved. [WHW]

A general comment was submitted in the April 2005 submittal and is as follows:

R645-301-800 BONDING AND INSURANCE

The Deer Creek Coal Mine currently has a bond in place that reflects the probable difficulty of reclamation, giving consideration to such factors as topography, geology, hydrology, and revegetation potential for the entire affected area. The bond was based on a detailed estimated cost, with supporting calculations for the estimates. The amount of the bond is sufficient to assure the completion of the reclamation plan if the work has to be performed by the DOGM in the event of forfeiture. Information about the bond is presented in R645-301-800: Bonding in Volume 2 of the Deer Creek Mine MRP.

When the application for the Rilda Canyon Portal Facilities is approved, the bond will be updated to reflect the added facilities.

Experimental Practice

R645-302-212.310, Clearly state the seed mix to be used on the experimental practice area in the description of the experimental practice in item #4, page 35 Experimental practice. [PWB]

The Biology Section: Experimental Practice - 4) Rilda Canyon Portal Facility Reclamation Plan has been revised to include the following reference:

The appropriate seed mix will be either broadcast or hydroseeded on the area at the rate specified in the Biology section (refer to Biology Section R645-301-341 Revegetation: Description of Revegetation Operations. The topsoil storage area will be seeded with the White Fir/Aspen seedmix (Biology Section: Table 300-10) and subsoil storage area will be seeded with the Pinyon-Juniper/Mountain Brush seedmix (Biology Section Table 300-8).

R645-302-212.400, (1) Anionic Polyacrylamide will be used at reclamation to enhance infiltration of water into the soils. The Division assumes that 20 years hence, advances will be made concerning the specifics of PAM application. The plan should indicate that details of the PAM application will be worked out prior to implementation (2) Investigation of the infiltration and erosion control on the PAM treated experimental practice area is implied under the heading R645-302-214.100 (page 25 Experimental practice), but the monitoring must be included as a sixth item in the Experimental Practice plan outline on page 28 and details of the site monitoring during years subsequent to reclamation must be provided. [PWB]

(1) PAM Application:

The Biology Section: Experimental Practice - 5) Reclamation of the Experimental Practice Area has been revised to include the following reference:

- 3) *Steep Slopes (greater than 2H:1V): soil surface will be treated with an anionic polyacrylamide (PAM) to increase cohesion and infiltration of the water during revegetation. The PAM product will be applied contemporaneously with the seed mixture. PacifiCorp will review details concerning the application type/rate with the Division prior to implementation.*

(2) Monitoring Plan:

The Biology Section: Experimental Practice - has been revised to include a discussion related monitoring of the experimental practice reclamation:

PacifiCorp will conduct monitoring to analyze the effectiveness of the experimental practice. The monitoring program will ensure the collection, analysis, and reporting of reliable data that are sufficient to enable the Division to evaluate the performance experimental practice procedures. Monitoring to be conducted on annual basis by a qualified specialist during revegetation reconnaissance and include;

Location:

Date:

Name of Specialist:

% Slope:

Exposure:

Area (acres):

Animal Use/Disturbance

Erosion:

Cover: (refer to Biology Section R645-301-340 Table 300-7, qualitative on years 1, 2, 3, 5, 6, 7 and quantitative on years 4, 8, 9 and 10)

Dominant Plant Species Observed

Notes:

Photographs

Reporting: Data will be reported in the Annual Reports.

In addition to reviewing the experimental practice area, the qualified specialist will compare the practice area to undisturbed areas adjacent to the sites.

In addition to addressing the deficiencies cited by the Division, PacifiCorp also revised the Soils, Biology and Engineering sections to reflect the comments noted by the Forest Service.