

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

February 21, 2007

JK

TO: Internal File

THRU: Pamela Grubaugh-Littig, Permit Supervisor *pgl*

FROM: Wayne H. Western, Team Lead *W.H.W.*

RE: Update Volumes 2 and 10, PacifiCorp, Deer Creek Mine, C/015/0018, Task ID #2746

SUMMARY:

On February 12, 2007, the Permittee submitted an amendment to update Map 4-5 (Waste Rock Site) to show guardrails that were installed but not shown on the surface facilities map. In addition, the reclamation cost estimate was adjusted to show the demolition costs associated with the guardrail. The amount of the bond is more than the reclamation cost estimate therefore, no adjustment to the bond is needed.

TECHNICAL MEMO

TECHNICAL ANALYSIS:

OPERATION PLAN

MAPS, PLANS, AND CROSS SECTIONS OF MINING OPERATIONS

Regulatory Reference: 30 CFR Sec. 784.23; R645-301-512, -301-521, -301-542, -301-632, -301-731, -302-323.

Analysis:

Mining Facilities Maps

The Permittee met the requirements of this section by updating Map CM-10778-DR, Deer Creek Coal Mine Waste Rock Storage Facility Phase I. The updated map shows the location of existing guardrail.

Certification Requirements

The Permittee met the requirements of this section by having Map CM-10778-DR certified by a registered professional engineer.

Findings:

The information provided in the application meets the minimum requirements of the regulations.

RECLAMATION PLAN

BONDING AND INSURANCE REQUIREMENTS

Regulatory Reference: 30 CFR Sec. 800; R645-301-800, et seq.

Analysis:

General

The Permittee met the bonding requirements by providing the Division with reclamation costs for the guardrail demolition and removal.

The Deer Creek mining and reclamation plan does not have a complete reclamation cost estimate. The MRP only has a summary sheet showing the reclamation cost of the main mine facilities and the Rilda Canyon facilities. The MRP does contain detailed cost estimate for the Rilda Canyon facility.

The Division needs an updated copy of the main mine facilities reclamation costs. Without the updated cost the Division cannot properly process the amendment. The Division would be unable to remove and replace the updated cost estimate.

Findings:

The information provided in the application is not considered adequate to meet the requirements of this section. Before approval, the Permittee must provide the following in accordance with:

R645-301-830.140 and R645-301-121.100, The Permittee must provide the Division with a current copy of the reclamation cost estimate. The Division's copy of the MRP does not contain detailed reclamation cost estimates for the main mine facility. Beside the need for the MRP to contain current information, the Division cannot process the amendment because the C2 for state to remove and replace pages which are not in the MRP. If the Permittee were to submit the reclamation information without a C1 and C2 for the Division would not easy know which pages to remove and replace.

RECOMMENDATIONS:

The Division should deny the application until all of the above deficiencies have been addressed.