



GARY R. HERBERT
Governor
GREG BELL
Lieutenant Governor

State of Utah

DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER
Executive Director

Division of Oil, Gas and Mining

JOHN R. BAZA
Division Director

Technical Analysis and Findings Utah Coal Regulatory Program

PID: C0150018
TaskID: 4686
Mine Name: DEER CREEK MINE
Title: REDUCE HYDROLOGIC MONITORING SITES

General Contents

Reporting of Technical Data

Analysis:

Conditional approval upon receiving clean copies with these minor edits.

Task 4686 Deer Creek mine MRP amendment has been previously evaluated as Task ID's: #4603, #4443, #4381, and #4332. The current Task 4686, Reduction in Hydrologic Monitoring Program, was submitted on September 19, 2014 to the Division of Oil, Gas, and Mining (Division) by PacifiCorp (the Permittee). The previous tasks evaluate the Permittee's justification to eliminate monitoring sites within their Hydrologic Monitoring Program, which are not evaluated here. In the current Task #4684, the Permittee addresses Task #4603 deficiencies relating to out-of-date and inaccurate references within MRP's for Deer Creek, Cottonwood/Wilberg, Trail Mountain, and Des-Bee-Dove mines.

Volume 9 Appendix A in the Deer Creek and Cottonwood/Wilberg MRP's has served as the up-to-date list of required water monitoring sites for the Deer Creek, Cottonwood/Wilberg, Trail Mountain mines for quite some time. While all three mines are owned by the Permittee, this is not necessarily the most logical format to compile the water monitoring sites for these mines. For instance Trail Mountain is for the most part hydrologically isolated from the Deer Creek and Cottonwood/Wilberg mines in East Mountain. Additionally, in the current MRP Volume 9 format, Des-Bee-Dove mine is referred to as if it is still active. While in fact the Des-Bee-Dove mine has been fully reclaimed and was given phase 3 bond release in August 2014.

In Task #4686, the Permittee removes Trail Mountain water monitoring sites from Volume 9 Appendix A, and separates Deer Creek and Cottonwood/Wilberg monitoring sites into Appendix A-1 and Appendix A-2, respectively. It is reasonable to keep using the same Volume 9 for Deer Creek and Cottonwood/Wilberg mine MRP's because they are both located in East Mountain and mine overlapping coal seams making them hydrologically connected to each other. Des-Bee-Dove is now correctly referred to in the past tense. Task #4686 clears up a significant amount of confusion associated with these MRP's. It is conditionally approved upon the Permittee addressing these edits that will make navigating the document easy, clear, and concise.

Additional tasks have subsequently been submitted to the Division by the Permittee to update the Trail Mountain MRP (Task #4716) and to help with navigating the Deer Creek MRP (Task #4715) and Cottonwood/Wilberg MRP (Task #4714).

R645-301-150.

The task submitted by the Permittee had Appendix A in footers, but the C2 form specifies to delete Appendix A from the MRP. These edits will fix this problem:

1) Footer in Volume 9 Deer Creek monitoring -- Appendix A-1 needs to be appropriately labeled 'Appendix A-1' throughout this section.

2) Footer in Volume 9 Wilberg/Cottonwood monitoring Appendix A-2 needs to be appropriately labeled 'Appendix A-2' throughout this section.

Columns in this table do not line up. This edit will correct this:

1) Correctly format the Table on Volume 9 p. 9 (pdf. p. 26) so columns line up correctly.

Incorrect value is stated:

1) Correct decimal place to match old MRP in 4th equation on p. 44 (pdf. p. 61).

The C2 form specifies to delete HM-1 from the MRP, however it is still referenced within the MRP. This edit will correct this problem:

1) Fix reference to Map HM-1 to be either Map HM-1A or Map HM-1B for pages listed here and any additional references throughout the document: p. 3 (pdf. 20), p. 13 (pdf. 30), p. 16 (pdf. 33), p. 50 (pdf. 67), p. 63 (pdf. 80), p. 66 (pdf. 83), p. 67 (pdf. 84), p. 68 (pdf. 85), etc.

The C-2 form incorrectly specifies to 'Add Appendix A-1' twice. This edit will correct this problem.

1) In form C-2: change 4th line to say: '[X] Add: Volume 9, Add Appendix A-2'

The submitted Appendix A-2 for Cottonwood/Wilberg water monitoring sites indicate to monitor SW-1, SW-2, SW-3. This is incorrect. These sites will be monitored under the Trail Mountain MRP. These edits will fix this:

1) In form C-2: add a new line '[X] Replace: Volume 9 Appendix A-2 with updated SW monitoring sites'

2) Volume 9 Appendix A-2: delete SW-1, SW-2, SW-3 as monitored sites in all sections of the Wilberg/Cottonwood monitoring program and from map HM-1B.

Water monitoring tables existed in the Volume 9 MRP, however in a past amendment they were deleted. This will add the tables back to the MRP.

1) In form C-2: '[X] Add: Volume 9, Add updated monitoring tables to Appendix A-1 Appendix A-2'

These water monitoring sites are not well organized on the page:

1) Fix formatting in Appendix A-1 Deer Creek Mine: line up Piezometric Wells in Rilda Canyon to match old MRP.

kstorar