

June 25, 2018

Electronically Submitted

Utah Coal Program
Utah Division of Oil, Gas, and Mining
1594 West North Temple, Suite 1210
P.O. Box 145801
Salt Lake City, Utah 84114-5801

Subject: Task #5690, Amendment to Volume 9, Appendix A-1 to Reduce the Hydrologic Monitoring Program for Sites Within and Outside Mine Permit Boundaries, PacifiCorp, Deer Creek Mine C/015/0018, Emery County, Utah. Request for Immediate Approval.

Task #5690, Amendment to Volume 1, R645-301-720 Hydrologic Resources and Monitoring Requirements (Including map HM-1A), to Reduce the Hydrologic Monitoring Program for Sites Within and Outside Mine Permit Boundaries, PacifiCorp, Deer Creek Mine C/015/0018, Emery County, Utah. Request for Immediate Approval.

PacifiCorp, by and through its wholly-owned subsidiary, Interwest Mining Company "Interwest", submitted an amendment to amend Volume 9, Hydrologic Volume, Appendix A, to reduce the water monitoring responsibilities as outlined in the hydrologic monitoring program, on June 6, 2018. PacifiCorp hereby requests immediate approval of the amendments for the following reasons:

Since the June 6 submission date, a wildfire that began as a prescribed burn and that jumped out of control on June 5, 2018, has spread across the top of East Mountain, burning 17,697 acres (27.7 square miles as of June 25) of lands above and around the PacifiCorp Deer Creek mine properties and permit area, devastating the vegetation and landscape. Nearly all of the surface springs that are in the PacifiCorp monitoring program that overlie the underground mining area are within the burned area. Nearly all of the few springs that remain outside the fire area are outside of the mining area as well. The destruction of the vegetation within the fire area has the potential to significantly alter the hydrologic characteristics of the springs and their recharge on East Mountain and mask any effects that could possibly be caused by mining. More than three years have elapsed since the cessation of mining activities at Deer Creek. Data presented in the above amendments shows that there has been no effect on the hydrologic balance from mining at Deer Creek. The spring monitoring program has now been rendered essentially useless for any further purpose by the fire.

The area inside the fire boundary, already hazardous to travel because of the rugged terrain and downed trees, has been made too dangerous to traverse now that the upright trees and branches

have been partially burned made unstable and burned out stump holes create a walking hazard. Surface conditions during rainy weather and storms will be especially dangerous now that there is no vegetation to hold surface soils in place.

PacifiCorp hereby urges the Division to approve immediately the amendments referenced above, to relieve PacifiCorp from exposing its personnel and staff from the monitoring tasks now made hazardous due to the alteration of the landscape. As a precaution to prevent potential harm to personnel, PacifiCorp is proposing suspending the sampling program indefinitely, but will suspend the program at least for the remainder of 2018.

Sincerely,



Ken Fleck

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Cc: file