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DEPARTMENT OF NATURAL RESOURCES

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Division of Oil, Gas and Mining

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July 2, 2020

Dennis Oakley, Senior Mining Engineer
PacifiCorp
c/o Thermal Generation Environmental Services
1407 W. North Temple, Suite 210
Salt Lake City, Utah 841116

Subject: 2019 Annual Report Review Completion, PacifiCorp, Deer Creek Mine, C/015/0018,
Task #6076

Dear Mr. Oakley:

The Division has completed the review of the 2019 Annual Report. The Permittee must provide the following information by July 16, 2020:

1. Provide the results of the soil sampling conducted at Deer Creek in 2019, including the sampling location and field data.
2. Provide the details and map of the remediation plan which was installed in the Fall 2019.

If you have any questions, please feel free to call me at (801) 538-5350.

Sincerely,

Steve Christensen
Coal Program Manager

SKC/sqs
Enclosure
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2019 ANNUAL REPORT

Submit the completed document and any additional information identified to the Division by March 31, 2020.

GENERAL INFORMATION

Company Name	PacifiCorp	Mine Name	Deer Creek Mine
Permit Number	C/015/0018	Permit Expiration Date	February 7, 2021
Operator Name	Interwest Mining Company	Phone Number	+1 (801) 220-4632
Mailing Address	1407 West North Temple, Suite 210	Email	dennis.oakley@pacificorp.com
City	Salt Lake City		
State	Utah	Zip Code	84116

DOGM File Location or Annual Report Location

Excess Spoil Piles	<input type="checkbox"/> Required <input checked="" type="checkbox"/> Not Required	
Refuse Piles	<input type="checkbox"/> Required <input checked="" type="checkbox"/> Not Required	
Impoundments	<input checked="" type="checkbox"/> Required <input type="checkbox"/> Not Required	See Attachment 1. Includes both Deer Creek and Rilda pond reports.
Other:		

OPERATOR COMMENTS

The Deer Creek sediment pond was drained in the last week of September of 2019 and removed and reclaimed in October 2019. Included with this annual report are the report forms for the 1st, 2nd, and 3rd, quarters of 2019. See Attachment 1. The Rilda pond was inspected in the 1st quarter of 2019. Reclamation of the pond began early in the second quarter and completed by May, 2019. Reclamation of the entire site was completed in June 2019. Attachment 1 includes the Rilda pond report.

REVIEWER COMMENTS Met Requirements Did Not Meet Requirements

The sediment levels in the main sediment pond were above the 60% sediment elevation. It was decided not to clean the pond since reclamation would remove the pond. The reports were reviewed. Pond reclamation at both locations has taken place. (KRH)

COMMITMENTS AND CONDITIONS

The Permittee is responsible for ensuring annual technical commitments in the Mining and Reclamation Plan and conditions accepted with the permit are completed throughout the year. The Division has identified these commitments below and has provided space for you to report what you have done during the past year for each commitment. If additional written response is required, it should be filed as an attachment to this report.

Title: RAPTORS

Objective: To document the location and activity of nests that could be affected by mining.

Frequency: annually

Status: Ongoing

Reports: Annually in Annual Report

Citation: MRP, Section 322, Subsection Terrestrial Species

OPERATOR COMMENTS

Prior to the start of reclamation at the Deer Creek Mine, ground truthing for raptor activity was conducted by both the company (December 2018 through February 2019) and the USFS wildlife biologist, Jeff Jewkes (January 31, 2019 and February 7, 2019). There exists two nests, 961 and 1287, within a one-half mile radius of the reclamation site. These nests were located and examined through a spotting scope. There were no activity in the nests (no greenery found) and no raptors noted flying in Deer Creek, Deer, or Elk canyons. The DOGM was contacted in January 2019 to discuss the ground truthing findings. PacifiCorp met with Todd Miller during the first week of February 2019. After review of truthing findings and communication with Jeff Jewkes, Mr. Miller gave PacifiCorp the "go ahead" to start mobilizing equipment to the site. On February 25, 2019, equipment began arriving at the Deer Creek Mine and immediately began work towards reclaiming the mine site.

REVIEWER COMMENTS

Met Requirements



Did Not Meet Requirements

Raptor observing and surveying was conducted in 2019 by both company personnel and biologists from the USFS. This process was done in coordination with DOGM biologists in order to assure that requirements were met. No activity was observed at eagle nests within the 1/2-mile radius of the active reclamation work. TM

Title: SUBSIDENCE MONITORING REPORT

Objective: To Determine the effects of subsidence

Frequency: Annually

Status: Ongoing

Reports: Submit in annual report

Citation: Volume 3, Appendix X

OPERATOR COMMENTS

No underground mining activities have occurred since January 7, 2015. An amendment to the MRP was approved January 3, 2019 to remove the commitment for annual subsidence monitoring and reporting. Refer to Task ID #5830.

REVIEWER COMMENTS

Met Requirements



Did Not Meet Requirements

Permittee discontinued all subsidence monitoring and subsequent reporting for all of their properties (Cottonwood/Wilberg and Deer Creek) in 2017 since the sites are stable and the maximum amount of surface deformation has been achieved. As mentioned above, the commitment for annual subsidence monitoring and reporting was removed from the MRP in January 2019 (Task# 5830).(JE-4/7/2020)

Title: WILDLIFE**Objective:** Adhere to wildlife exclusionary periods during reclamation activities**Frequency:** During Reclamation**Status:** Reclamation Pending**Reports:** Not Required**Citation:** MRP, Section 322, page 10; Section 330, page 16 #14; Section 342, page 32, #7**OPERATOR COMMENTS**

Reclamation activities were suspended in Rilda Canyon in December 2018 and did not resume until after April 15, 2019. Reclamation to the Rilda Portal Facilities were completed in June 2019. An "as-built" amendment of the reclamation of the Deer Creek Mine and to remove commitments in the MRP that are no longer applicable is forthcoming.

REVIEWER COMMENTS Met Requirements Did Not Meet Requirements

Reclamation activity at the site adhered to wildlife exclusionary periods. TM

Title: DEMONSTRATION OF SELECTED OVERBURDEN AS BEST AVAILABLE MATERIAL IN THE PERMIT AREA FOR USE AS SUBSTITUTE TOPSOIL**Objective:** Monitor chemical quality of identified substitute topsoil to show reduction in sodicity.**Frequency:** Sampling will occur once within each permit term until such time as the soils are found acceptable for substitute topsoil use. The current permit term is 2016-2021.**Status:** To be conducted once in current permit term**Reports:** Annual Report**Citation:** Volume 2, Part 4, section R645-301-233, page 2-3**OPERATOR COMMENTS**

Reclamation of the Deer Creek mine site occurred during the months of February thru October 2019. The Operator conducted a extensive sampling program to ensure the best available soil were used as topsoil. The results of this program will be included in the MRP later in 2020.

As outlined in the permit (Volume 2, Part 4, section R645-301-233) noted soils along the corridor of the Deer Creek buried by-pass culvert would be utilized as a substitute topsoil. These soils were utilized during reclamation for this purpose. An "as-built" amendment of the reclamation of the Deer Creek Mine and to remove commitments in the MRP that are no longer applicable is forthcoming.

REVIEWER COMMENTS Met Requirements Did Not Meet Requirements

0423/3030, PB. The Permittee did not meet the requirements, because the soil analyses have not been provided. I coordinated with Mr. Oakley through email, phone calls and inspections concerning soil sampling in 2019 (July 10 Insp Rpt #6468 and email string July 29, 2019). In an August 2019 phone call, I confirmed the plans to sample the surface soils in Elk Canyon and Deer Creek Canyon with Mr. Oakley. In a September 2019 phone call, Mr. Oakley conveyed to me that extreme SAR and EC values found in surface soils would be remediated. A BYU PhD candidate, Rachel Buck, was consulted regarding remediation. Please note: if the soil SAR is greater than 15, than CEC & ESP determinations should be made by the laboratory as well (Vol 2, p. 2-3 and 2-4). The soil analytical data, sample location and details of the remediation plan are requested at this time.

Title: SUBSOIL TESTING**Objective:** Regraded subsoil will be sampled on 500 ft intervals to a depth of 4 ft (three or four samples for the 2,000 linear feet in the facilities area). Samples will be analyzed on site for pH and EC. Problem areas will be further sampled and sent to a laboratory for analysis.**Frequency:** At final regrading**Status:** Ongoing at reclamation**Reports:** Laboratory analysis to be provided to the Division**Citation:** Volume 11, Section R645-301-231.300

OPERATOR COMMENTS

The Operator conducted a extensive sampling program to ensure the best available soils were used in the top 4 feet of the reclaimed surface. The results of this program will be included in the MRP later in 2020.

REVIEWER COMMENTS

Met Requirements

Did Not Meet Requirements

0423/3030, PB. Deer Creek MRP Vol. 11, Section R645-301-231.300 (p. 16) describes the sampling of graded subsoils prior to topsoil redistribution at Rilda. Final sampling of Rilda soils was provided with the as-built amendment task 6013 in 2019. The task was subsequently withdrawn. We discussed deficiencies with the soil analyses on January 16, 2020, during a meeting at the Salt Lake office. The soils analytical results for Rilda must be provided to meet the requirements of this commitment.

Title: TOPSOIL HANDLING TESTING PLAN

Objective: Three composite samples will be taken from the facilities area and sediment pond. Samples will be analyzed for parameters to be compared with baseline information and to determine the need for amendments, including fertilizer.

Frequency: Final Reclamation

Status: Ongoing

Reports: Analysis to be provided to the Division

Citation: Volume 11, Section R645-301-242

OPERATOR COMMENTS

Final reclamation of the Rilda Portal Facility was completed in June 2019. Two samples were taken from the facilities area. However, the operator failed to complete the sampling at the pond. The operator will take the sample in the sediment pond area in the spring of 2020 when weather permits.

REVIEWER COMMENTS

Met Requirements

Did Not Meet Requirements

4/23/2020, PB. MRP Volume 11, Sections R645-301-242 and R645-301-243 refer to topsoil laboratory sampling and analyses conducted during reclamation. In May 2019, Mr. Oakley and I discussed the use of 16:8:8 (N:P:K) fertilizer at both Deer Creek and Rilda reclamation sites if warranted, based upon sampling results. The use of fertilizer should be confirmed and the results of sampling for nutrient analyses at are requested at this time.

FUTURE COMMITMENTS AND CONDITIONS

The following commitments are not required for the current annual report year, but will be required by the permittee in the future as indicated by the "status" field. These commitments are included for information only, and do not currently require action. If you feel that the commitment is no longer relevant or needs to be revised, please contact the Division.

Title: REFERENCE VEGETATION SAMPLING

Objective: Ensure that veg reference areas remain appropriate for comparison at time of reclamation.

Frequency: Reference area qualitative and quantitative monitoring will continue on a five year interval through mine reclamation and bond release.

Status: Next sampling to be conducted in 2017

Reports: Annual Report

Citation: MRP, Volume 1, Vegetation Monitoring Plan, page 2-174, paragraphs 4 & 5

REPORTING OF OTHER TECHNICAL DATA

Please list other technical data or information that was not included in the form above, but is required under the approved plan, which must be periodically submitted to the Division.

Please list attachments:

Attachment 1: Impoundment Reports for 1st through 3rd quarters, 2019.
Attachment 2: Deer Creek Hydrologic Monitoring.

REVIEWER COMMENTS Met Requirements

Did Not Meet Requirements

The Deer Creek Hydrologic Monitoring report in Attachment 2 states that there was no discharge into Deer Creek drainage from UPDES 001 or into Huntington Creek from UPDES 003. Water quality and flow data was submitted to the Division's data base for both outfalls indicating that there was discharge from both of these locations in 2019. (KNH 6/30/2020)

MAPS

Copies of mine maps, current and up-to-date, are to be provided to the Division as an attachment to this report in accordance with the requirements of R645-301-525.240. The map copies shall be made in accordance with 30 CFR 75.1200 as required by MSHA. Mine maps are not considered confidential.

Map Name	Map Number	Included		Confidential	
		Yes	No	Yes	No
Annual Subsidence Map - Not Applicable		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Mine Map - Not Applicable		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Raptor Survey within Permit Boundary - see comments		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

REVIEWER COMMENTS Met Requirements Did Not Meet Requirements

N/A