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December 23, 1986

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DIVISION OF
OIL, GAS & MINING

Mr. Lowell P. Braxton
Administrator, Mineral Resource
Development and Reclamation Program
State of Utah
Department of Natural Resources
Division of Oil, Gas & Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

Re: Response to Mid-Term Review, Wilberg Mine,
Act/015/109, Folder #2, Emery County, Utah

Dear Mr. Braxton:

In response to the Wilberg Mine MRP Mid-Term Review, submitted are twelve (12) copies each of both text material and maps to update the MRP as per your letter dated November 3, 1986.

Attached with this letter is a four (4) page listing summarizing our response to your staff's mid-term questionnaire.

All submitted materials are numbered and marked for easy insertion into the MRP. The following changes should be made:

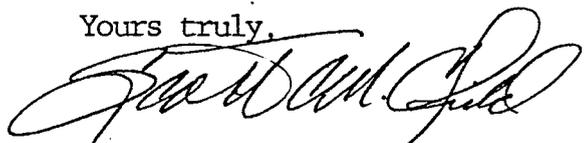
	<u>REMOVE</u>	<u>INSERT</u>
<u>VOLUME 1</u>	Table of Contents Pages 13, 14, 15	✓ Revised 12/8/86 Table of Contents Pages 13, 14, 15
	Pages 1-1 thru 1-5 1-10, 2-78	✓ Revised 12/8/86 Pages 1-1 thru 1-4, 1-10, 2-78, 2-78A,
		✓ Add figure 2-8A

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Page Two

	<u>REMOVE</u>	<u>INSERT</u>
VOLUME 2	Pages 3-21, 3-22, 3-25, thru 3-30B, 3-32, 3-35, 3-43, 3-48, 3-50, 3-54, 3-56, 4-12 thru 4-17, 4-20 and two (2) pages within the reclamation schedule (see replacement pages)	Revised 12/8/86 Pages 3-21, 3-22, 3-25 thru 3-30 A&B, 3-32, 3-35, 3-43, 3-46 A&B, 3-48, 3-48A, 3-50A, 3-54, 3-54A, 3-56, 4-12 thru 4-17, 4-20 and two (2) revised reclamation schedules re: Item #10
VOLUME 3	Map 1-2	Revised 12/19/86 Map 1-2
VOLUME 4	Map 2-12 & 2-13	Revised 12/19/86 Map 2-12 & 2-13
VOLUME 6	From map packet 3-10 South Sediment Pond detail drawing #CM-10354-CP	N/A
	Maps 3-13 thru 3-16	Revised 12/19/86 Maps 3-13 thru 3-16
	Map Packet 3-16A	N/A
	Maps 3-27 & 3-28	Revised 12/19/86 Maps 3-27 & 3-28
	N/A	Map Packet 4-5, Addition Dated 12/19/86

We apologize for the delay in our response. If you have any questions, please call.

Yours truly,


FOR C.E. Shingleton, Director
Permitting, Compliance and Services
Mining Division

CES:SMC:sbw
Enclosures

cc: - Val Payne
Jerry Taylor
R.C. Fry

UTAH POWER & LIGHT COMPANY
COTTONWOOD/WILBERG COAL MINE
MID-TERM REVIEW - RESPONSE

UMC 771.23

(b) Mining area hydrology data map Drawing CE-10496-WB, Map 2-13, has been updated to reflect current water measuring and monitoring stations.

Changes accountable to the fire and the bringing on line of the Cottonwood portal complex are represented by modification to the text and surface facility mapping. Also, changes made to the Cottonwood fan portal because of the new county road have been updated.

(b) (1) A new mine plan, including mining to 1990 will be submitted upon completion.

(2) An underground water monitoring map has been added to the ground water section.

UMC 782.13

(d) (5) Changes which have taken place since the 1981 submittal have been duly noted. This includes owner/operator and all officers and board members.

UMC 783.13 - Ground Water

(a) (2) Recession curves from Burnt Tree Spring and spring 84-56 will be included in the 1987 hydrological monitoring report. Both springs were measured during the past two years. Failure to report was due to a printing error.

Numbering and subsequent changes in the underground monitoring well locations has been finalized and shown on new mapping which will be inserted as part of the mid-term review.

A new composite map showing interrelationship of surface springs, past mining and measured subsidence has been constructed as requested; however, its actual placement belongs with the monitoring reports rather than the MRP because information shown on the map is constantly changing requiring at least annual updating to represent correctness.

UMC 783.14 - Geology

(a) (1) (iii) Although UP&L has analyzed over 130 samples of the rock surrounding the Hiawatha coal seam, the Division has requested that more samples be analyzed. Additional data regarding this matter is not currently available; therefore, UP&L commits to analyzing additional samples of the Hiawatha seam overburden and underburden. This sampling shall include testing for all toxic or toxic forming substances as listed in UMC 817.48. The samples shall be in numbers great enough to identify the range of all toxic forming substances and the variability of these materials.

UMC 783.15 - Ground Water Information

(a) (4) This question was responded to in text. See pages 2-78, 2-78-A.

UMC 780.20 - Subsidence Control Plan

(a) (2) Division request for specific mapping outlining areas of mining affecting aquifer recharge is redundant to previously submitted information. Reference, please, the hydrology section of the MRP, Mining Plan, interrelationship map and the annual Subsidence Report.

UMC 817.71

Disposal of underground development waste and excess spoil at the presently approved waste rock site is nearing an end. Original design incorporated a small 48 acre parcel of federal land which was generally flat and disposal was accomplished using accepted land fill practices.

Since the underground fire at Wilberg, most of the available storage has been lost to disposal of fire-related cleanup material. Permittee is evaluating alternate sites to fulfill future long-term needs for both Cottonwood/Wilberg and Des-Bee-Dove Mines. Submittal and approval for this site will entail a separate action.

Until an alternate site is submitted for Division approval permittee requests the present disposal area remain as is. Completion of the final cell has been constructed.

UMC 817.100

No comment required.

UMC 111-114 - Revegetation

(1) (2) Both interim and final revegetation descriptions have been modified to eliminate Division's concerns as to hand-cultivating and rodent control.

(2) Permittee agrees, final reclamation should state raking before mulching changes are noted.

(3) No comment required.

(4) Seed mix has been finalized as previously approved. All changes are noted.

UMC 817.116 - Revegetation Standard for Success

(1) No comment required.

(2) Monitoring schedule has been changed to include final two years of final reclamation bond period.