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power**

& LIGHT COMPANY
MINING DIVISION
P.O. Box 310
Huntington, Utah 84528

Mine file
John Whitehead
ACT/015/019

RECEIVED
SEP 14 1987

DIVISION OF OIL
& MINING

September 3, 1987

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

Dear Mr. Braxton:

Re Partial Response to Outstanding Mid-Term Review
Wilberg/Cottonwood Mine, ACT/ 015/019

This is in response to your letter of August 4, 1987, concerning the above subject.

Waste Rock Disposal Site

The final cell (7 and 8 combined) in the existing permitted waste rock site has capacity for 55,800 cubic yards of material and in addition there is minimal capacity remaining in cell number 6. The quantity of waste rock generated from the coal handling and processing facilities and the waste rock separately transported directly from the mine is approximately 250 cubic yards per week. At these quantities the existing waste rock site will be full in about four and one-half years or sometime in 1992. Sediment disposal from the Wilberg/Cottonwood and Des-Bee-Dove sediment ponds will consume minor capacity. Because of uncertainties in waste rock generation we plan to have a new waste rock site permitted by 1990.

In response to your request, Utah Power & Light Company will have a complete permit application for a new waste rock disposal site filed with the Division during the fourth quarter of 1988.

The as-built drawing, number CR.10361-WB, submitted on June 8, 1987, showing one disposal cell (sites 7 & 8 combined) is the correct configuration. Fourteen copies of the drawing were submitted on June 8, 1987, with information that they should be inserted in the Wilberg MRP appendix volume, Section VII.

Mr. Braxton
Page 2
September 3, 1987

Mine Sequence

The plan for mining the longwall panel between 8th West and 9th West has been changed. Because of coal quality concerns encountered in development of 8th West, it has been decided that the panel will not be extended as far into the Miller Canyon area as previously planned and the longwall face will start at cross-cut 49 instead of cross-cut 62. This plan change will avoid longwall mining under most of the cliffs in the Miller Canyon area for the first panel. We would expect that most--if not all--of the various agencies' concerns about the mine sequence issue would be resolved with this plan change and would invite another meeting at this time if you feel it is appropriate.

Raptor Monitoring Plan

Our Golden Eagle Nesting/Cliff Subsidence Monitoring Plan that has been accepted by DOGM and all interested agencies will be incorporated into MRP text at an appropriate location.

Vegetation Monitoring

Aerial photography will be used for delineation of vegetative types, documentation of changes in vegetation and detection and monitoring of stressed vegetation.

Field studies, including permanent transects and photo stations, will provide detailed quantitative and qualitative vegetation data. The field study data points will be tied to the surface survey control system.

The vegetation monitoring information and an evaluation of the impacts of mining on vegetation will be submitted in an annual report following the year in which monitoring is conducted.

The MRP text for final reclamation monitoring (p.4-20) and the reclamation time schedule (following p.4-31) will both be modified so they will correspond as suggested at item 2-c in your internal correspondence of June 30, 1987.

Compliance with Federal Lease Stipulation and Conditions

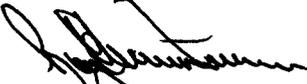
Utah Power & Light Company will comply with all federal lease stipulations and conditions, including vegetation monitoring and reporting. Intermountain Aerial Survey has been contracted to do color infrared photography for Utah Power & Light Company during August/September 1987, and the evaluation of the photography will be incorporated in the Vegetation Monitoring Report for 1987.

I hope this letter addresses all your concerns expressed in your memo to me of August 4, 1987. We will transmit appropriate text revisions, maps,

Mr. Braxton
Page 3
September 3, 1987

schedules, etc., to you by September 28, 1987, that should clear all the unresolved items of the Wilberg/Cottonwood mid-term review.

Sincerely,



Ray Christensen
Permitting & Compliance

RC/mj

cc: John Boylen
Jim Hislop
Val Payne
File