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State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

Norman H. Bangerter
Governor
Dee C. Hansen
Executive Director
Dianne R. Nielson, Ph.D.
Division Director

355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203
801-538-5340

Your Copy

April 7, 1989

Mr. David R. Smaldone, Director
Permitting, Compliance and Services
Mining Division
Utah Power and Light Company
41 North Redwood Road
Salt Lake City, Utah 84140

Dear Mr. Smaldone:

Re: Initial Completeness Review and Preliminary Technical Deficiency Comments, Five-Year Permit Renewal, Utah Power and Light Company, Wilberg/Cottonwood Mine, ACT/015/019, Folder #2, Emery County, Utah

Attached is an Initial Completeness Review (ICR) and a set of preliminary Technical Deficiency comments for the Wilberg/Cottonwood Mine Five-Year Permit Renewal. As you know, the current Wilberg/Cottonwood Mine Permit expires on July 6, 1989. Moreover, the permit renewal requires, under UMC 788.14(b)(1), public notification for 30 days followed by a 30-day public comment period. In order to achieve these timeframes, I am requesting that you submit your response to the attached ICR by no later than April 24, 1989.

Sincerely,

Richard V. Smith

Richard V. Smith
Acting Permit Supervisor

djh
Attachment(s)
cc: L. Braxton
A Team
AT8/58

an equal opportunity employer

INITIAL COMPLETENESS REVIEW
WILBERG/COTTONWOOD MINE
ACT/015/019

Utah Power and Light Company
Emery County, Utah

April 5, 1989

UMC 771.23 Permit Application: General Requirements for Format and Contents - (PGL/BW)

The application must be current. All references to items that are outdated or not applicable must be deleted (for example, references to the mine railway on page 3-57).

(e)(1) A permit area map for the Wilberg/Cottonwood Mine must be submitted. The permit area map varies throughout the PAP; e.g. Plate 3-1 has an incorrectly defined permit area by the proposed Cottonwood Fan Portal.

(e)(2) A mine map must be submitted that clearly shows if any mining activities had taken place prior to August 3, 1977, or prior to May 3, 1978. Although the mine was constructed in 1978 (Vol. I, page 2), there is no indication when actual underground coal mining activities occurred, or if any disturbances existed prior to construction.

UMC 771.25 Permit Fees - (BW)

A copy of the $5.00 permit fee receipt needs to be included in the PAP.

UMC 782.13 Identification of Interests - (PGL/BW)

The legal description of surface ownership must be corrected as follows:

1. Description of the Seeley estate - Section 9, T17S, R7E, SLM should read S1/2 NW1/4, SW1/4 NE1/4 (page 1-10); and

2. Description of UP&L - Section 17, T17S, R7E, SLM should read W1/2 SW1/4 (omit comma) (page 1-10);

(a)(6) The resident agent who will accept service of process must be included in the PAP.

(a)(6)(b) The PAP should include a statement to indicate whether the applicant is a corporation, partnership, single proprietorship, association, or other business entity.

(a)(6)(b)(2) Name and address of any person who is a principal stockholder of the applicant should be included in the PAP. Replace page 1-5 with UP&L principal stockholders.

(b) The PAP must contain a statement that describes the relationship between UP&L and Pacific Corporation. Moreover, the PAP must identify all coal mining operations that are currently part of Pacific Corporation.

(c) The PAP must list the principal officers of Pacific Corporation.

(e) The address for the BLM on page 1-5 must be updated to 324 South State Street, Salt Lake City, Utah 84111.

UMC 782.14 Compliance Information - (BW)

The PAP must contain relevant compliance information, as described in this section, for all coal mining operations that are part of Pacific Corporation and listed under UMC 782.13(b).

UMC 782.15 Right of Entry and Operation Information - (BW)

The applicant must update all coal leases, subleases, and any additional Special Use Permits (page 1-18).

The description of the McKinnon estate, Section 11, T17S, R7E, SLM and Cooperative Security Corporation lease in T17S, R7E, SLM Section 23 should be revised to correspond to drawings CM-10520-WB, i.e., Section 11: W1/2 SW1/4, S1/2 SW1/4 NW1/4; Section 23 should be Section 11.

UMC 782.18 Certificate of Liability Insurance - (PGL)

An updated certificate of liability insurance must be submitted for inclusion in the PAP.

UMC 782.19 Identification of Other Licenses and Permits - (PGL)

(b) The address for the Division of Oil, Gas and Mining on page 1-22 must be updated.

(d) The permit approval date must be corrected on page 1-22 to state "July 6, 1984".

UMC 782.21 Newspaper Advertisement and Proof of Publication - (BW)

The newspaper advertisement must be filed with the Division within four weeks following the date of publication.

UMC 783.17 Alternative Water Supply Information - (DW/TM)

Information must be supplied on an alternative source or sources of water that could be developed to replace the existing sources should contamination, diminuition, or interruption result. Please submit this information for inclusion in the PAP.

UMC 783.18 Climatological Information - (BAS)

(a) Climatological information begins on page 2-98, rather than 2-97, as indicated in Table of Contents. Please correct.

Recently submitted pages 2-98 and 2-99 displace previously existing material. Please advance pagination of old 2-98, 2-99 and 2-100.

Please update Tables P and Q (pages 2-98 and 2-99), and Figure 2-9 (following page 2-100), which display outdated precipitation, temperature and wind data.

UMC 783.19 Vegetation Information - (BAS)

(a) Please update Table 3 on page 2-109, Table 3 on page 2-136, and Table 2 on page 2-123, as needed, to indicate disturbed acreages for the Wilberg/Cottonwood Mine, Cottonwood Fan Portal, and Waste Rock Storage Site, respectively.

UMC 783.21 Soil Resources Information - (HS)

The applicant must submit an Order 1 Soil Survey (USDA/Soil Survey Manual: Title 430) of the area disturbed by mining. This must include a map (minimum scale of 1:6,000) delineating different soils, a description (pedon description) for each different soil, and present and potential productivity of existing soil. All soil surveys shall be conducted and/or approved by a qualified professional Soil Scientist.

The General Soils Map of the Wilberg/Cottonwood Mine Permit Area (Map 2-17) depicts the Waste Rock Storage Site as having the same Great Group classification as the upland areas of East Mountain (Typic Cryoborolls). Based on the vegetation type, moisture and temperature regime of the area surrounding the Waste Rock Storage Site, the great group classification above is unlikely. Please change shading of the waste rock site to depict correct soil Great Group.

Additionally, the Great Group classification depicted on Map 2-17 directly contradicts the Great Group classifications of the baseline vegetation study. Please clarify the discrepancy.

The table displayed on page 2-151 describes soil series which are not described in the text or on a map. Please clarify this discrepancy by including the correct soils found on the mine site.

The soil series encompassing the Waste Rock Disposal Site does not have a present and potential productivity statement. Please derive appropriate information from the Soil Survey, Carbon-Emery Area, UTAH.

UMC 783.22 Land Use Information - (HS)

The Land Use Plan for the Wasatch Plateau designates no recreation or timber harvest for East Mountain. However, Map 2-19 designates East Mountain as a predominantly recreational and infrequent timber harvest region. Please rectify this discrepancy.

UMC 783.24 Maps: General Requirements - (PGL)

(a) and (b) Plates 1-1 and 1-2 indicate Northwest Carbon Co. and Swisher Coal Company as surface and subsurface owners. Is this information current? If not, please correct accordingly.

UMC 783.25 Cross-Sections, Maps and Plans - (PGL)

All of the plates required for this section must be certified. Certification requires stamp, signature and date of certification. If there are revisions to the plates, the certifying engineer should date each revision.

(a)(c)(d) Plates 2-1 through 2-12 must be certified.

(b) Plate 2-19 must be certified. There are two plates labelled 2-19. One is entitled "Raptor Locations" and the other is "Land Use". This is confusing and there should be only one plate per title. Please correct.

(e) A plate must be submitted that includes the location and extent of known workings (active, inactive or abandoned) including mine openings to the surface within the permit area and adjacent areas.

(i) Plate 3-16, Surface Facilities, must be certified.

UMC 784.11 Operation Plan: General Requirements - (PGL)

(b)(5) The oil recycling program at the Wilberg/Cottonwood Mine must be described in the PAP.

UMC 784.13 Reclamation Plan: General Requirements - (PGL/BAS)

(a) The last paragraph of page 4-27, and top paragraph of page 4-28 should be updated to describe what reclamation procedures were actually employed in 1981.

Please provide a header for page 4-29, such as "Cottonwood Fan Portal Reclamation of 1981."

A plan must be provided for imminent final reclamation of the Cottonwood Fan Portal highwall. Plans must be described and implemented for final revegetation of all portal areas considered interim.

Describe plans and scheduling for final bond release vegetation sampling for interim and final revegetation and the soon-to-be reclaimed highwall.

Please update status of shrub test plantings (page 4-15). Discuss past plantings, results, and future plans. Reference annual reports.

(b) Please provide an update on the Waste Rock Storage Site (pages 4-21-A to 4-26). Describe as-built design, future plans and monitoring program. Clarify whether past revegetation has been interim or final. Identify seed mixes on Tables 1, 2 and 3 (pages 4-24 to 4-26) as being interim or final. Combine these tables, if appropriate.

(b)(3) Plates 4-1 and 4-2 illustrate the final contours for the Wilberg/Cottonwood Mine. The operator should identify any highwalls that will be retained. A mass balance (cut and fill) table must be included in the PAP.

(b)(5)(i) Final reclamation procedure (page 4-18) must specify timing for seeding. Late fall is best. Otherwise, early spring would be acceptable.

The PAP must state that if considerable time (i.e., over one month) lapses between seed bed preparation and seeding, the soil will be protected with a mulch cover, which will be mechanically or chemically anchored. Mulching must take place as soon as practicable after soil distribution and grading. A covering of hay mulch, sufficient to provide 50 percent ground cover is acceptable.

(b)(5)(ii) The Division recommends that interim and final reclamation seed mixes (pages 4-12 and 4-13, 4-16 and 4-17, respectively) be revised to provide substitutions for those species which are not readily available commercially.

UMC 784.14 Reclamation Plan: Protection of Hydrologic Balance - (DW/TM)

(a)(2) The present users are identified, but no proof of right or quantity is given. Please add this information in the form of a location map showing water rights and a list of the pertinent water rights information in the PAP.

(a)(3) Show projected monitoring well locations in-mine on appropriate map.

(b)(3) Identify in monitoring plan operational and baseline monitoring sites. Supply updated map showing currently monitored springs. Commit to field verification of springs included in the next five year permit term in July of 1989 for addition to current monitoring plan. Reinsert last paragraph on page 2-72 and first paragraph on page 2-73 wherein the applicant committed to collecting ground-water data in the mine.

(c) Show proposed monitoring locations and study area to support Probable Hydrologic Consequences study on the appropriate map.

(d) Page 4-2 is missing. This page has the specifications for portal seals. Please add this page.

UMC 784.16 Reclamation Plan: Ponds, Impoundments, Dams and Embankments - (PGL/DW/TM)

(a)(1)(i) All sedimentation pond cross sections must be certified.

(a)(1)(iii) Provide the following items for all siltation structures associated with the main mine site and the Cottonwood Fan Portal.

1. Provide design calculations which document information found in the PAP to show compliance with the new rules.

2. Inputs for calculations shall be summarized in table form with the appropriate formulas included in the text of the PAP.

3. Contributing watershed areas to siltation structures shall be shown on appropriate map.

(a)(1)(v) Plates for this section must be certified, including a stamp and statement of certification by a registered professional engineer or geologist. Please add appropriate certifications.

(a)(3)(iii) A more complete maintenance plan is needed. Please address each specific structure operation and maintenance requirements.

(3)(iv) Postmining hydrologic map must show a monitoring location located before any sediment pond to document compliance with state and federal regulations prior to sediment pond removal.

UMC 784.17 Protection of Public Parks and Historic Places - (BW)

Attachment Three of the 1980 Archeological Sample Survey and Cultural Resource Evaluations of the East Mountain Locality indicate that the Old Johnson Mine has the potential for nomination to the National Register. Please update the status of any mitigation plans, if required.

UMC 784.19 Underground Development Waste - (BW)

The Underground Waste Plan, Appendix VII, needs to be updated to reflect actual on-site conditions. Text and figures indicate that only 18 inches of material will be excavated, and also that waste material will be placed in a single four-foot horizontal lift (page 4, 5).

Please explain how the berms at the southern end of the site were developed and if any additional material was excavated. Also, please incorporate into the PAP additional plans for a new waste disposal site.

UMC 784.20 Subsidence Control Plan - (RVS)

The section of the PAP entitled "Subsidence Control Plan" (page 4-41 through 4-49-A) must be updated to reflect the approved amendment to the subsidence monitoring plan dated January 27, 1989 (see Appendix XVI). Moreover, the discussion of vertical movement should be updated to incorporate recently measured values (last paragraph, page 4-46) and the discussion about mining beneath Cottonwood Creek should be deleted (page 4-49-A).

UMC 784.22 Diversions - (DW/TM)

Provide the following items for all disturbed and undisturbed diversions and culverts associated with the main mine site and the Cottonwood Fan Portal.

1. Number all structures (i.e., diversions and culverts).

2. Provide the appropriate design calculations to show compliance with the appropriate design criteria spelled out in the new rules.

3. All inputs for calculations will be summarized in table form on Map 3-16 and example calculations included in the text of the PAP.

4. Contributing watershed areas to disturbed and undisturbed diversions and culverts must be shown on appropriate map.

UMC 784.23 Operation Plan: Maps and Plans - (PGL/DW/TM)

(b)(3) The area of land for which the performance bond will be posted must be identified as such on an appropriate map.

(b)(6) Plate 3-13 for water diversion, collection, conveyance, treatment, storage and discharge facilities does not have a legend. Please add legend.

(b)(9) The explosive storage and handling facility must be identified on an appropriate map.

(b)(11) Plates 4-1 and 4-2 must have dated certifications.

UMC 784.24 Transportation Facilities - (PGL)

The PAP refers to the mine track and locomotive system on page 3-57. This is outdated information and must be deleted throughout the text. Please update the PAP accordingly.

djh
AT76/1-9
April 5, 1989

PRELIMINARY
TECHNICAL DEFICIENCIES
WILBERG/COTTONWOOD MINE
ACT/015/019

Utah Power and Light Company
Emery County, Utah

April 5, 1989

UMC 800.0 Bonding and Insurance - (PGL)

The applicant must submit completed Bonding and Reclamation Agreement Forms before issuance of the permit renewal. An updated Certificate of Liability Insurance (Division form) must also be submitted for inclusion in the PAP.

UMC 817.11 Signs and Markers - (BW)

The applicant must describe the specifications, duration of maintenance, and placement of mine and permit identification signs, perimeter markers, buffer zone markers, blasting signs, and topsoil markers for inclusion in the PAP.

UMC 817.12-.15 Casing and Sealing of Exposed Underground Openings (BW)

The applicant must commit in the PAP to seal Newberry Canyon Breakout between July 1 and January 31. Also, the applicant must clarify the location of Channel Canyon portal.

UMC 817.22 Topsoil: Removal - (HS)

The PAP (page 2-144) states that soil tests were conducted on the disturbed, undisturbed, and coal waste areas to determine the capabilities of the material to support vegetation for final reclamation. The data generated from this survey must be submitted to the Division along with a map clearly depicting the sample site locations.

The applicant has proposed utilizing existing fill on site as a plant growth medium for final reclamation. Data submitted (page 4-8 and 4-9) as characterization of fill material is incomplete. To fully characterize the proposed substitute topsoil, the applicant shall submit: physical and chemical analyses of the fill material on site (constituents analyzed shall be the constituents outlined in the Division's Guidelines for Management of Topsoil and Overburden, Table 1; samples shall be collected at a depth of 0-15 cm, 15-30 cm and 30 cm thereafter, or until planned excavation depth is reached); a map of the proposed substitute topsoil areas and soil sample locations; and calculations which estimate the volume of suitable substitute topsoil available for redistribution.

Determination of reclaimability for the proposed substitute topsoil material will be based on chemical and physical analyses and success or failure of interim revegetation efforts. The applicant must specify interim revegetation monitoring procedures (i.e., frequency of monitoring, parameters, etc.) and success standards.

Page 4-11 of the PAP states that a detailed analysis of the proposed substitute topsoil productivity will occur. Please specify constituents to be analyzed, test methodologies employed, and extent and frequency of monitoring.

The PAP states (page 4-15) that shrub survival will be judged as 50 percent crown alive. This is an ambiguous statement which needs clarification.

The PAP states (page 4-15) that ground cover will be a monitored parameter. Please change cover reference to canopy cover.

UMC 817.24 Topsoil: Redistribution - (HS)

The applicant has not committed to the ripping of regraded spoils. In accordance with this section, regraded land shall be treated to eliminate slippage surfaces and promote root penetration. Thus, the applicant must employ this procedure and reflect this within the PAP.

The applicant must describe (i.e., machinery) how topsoil will be redistributed and how excess compaction of the redistributed soil will be prevented or amended.

A soil fertility analysis must occur before seeding and after topsoil redistribution. Please reflect this requirement within the reclamation plan.

The Reclamation Schedule (table form) indicated that acid and toxic material handling will occur after backfilling and grading occurs. This should occur simultaneously. Please amend the schedule to reflect the proper sequencing.

The PAP states (page 4-11) that surface irregularities will be created by workers' footprints. This is not a practical procedure for approximately 50 acres of reclamation. Please identify how surface roughness will be achieved.

UMC 817.48 Hydrologic Balance: Acid-Forming and Toxic-Forming Materials - (HS)

A meeting between Division staff members and representatives of UP&L was held on March 29, 1989, at the UP&L office in Huntington, Utah. During that meeting, it was agreed that UP&L would submit raw data of roof and floor material, four advance drill hole core analyses, and a map clearly depicting the location of the above sample sites. The Division agreed to synthesize this data and determine if continued collection of roof and floor samples is necessary in the future.

UMC 817.61-.68 Explosives - (PGL)

The applicant must describe the use of explosives at the Wilberg/Cottonwood Mine for inclusion in the PAP.

UMC 817.71-.72 Disposal of Underground Development Waste - (PGL/BW)

The applicant must describe future plans for disposal of underground development waste for inclusion in the PAP.

The applicant must update the text, figures, and accompanying maps to reflect actual site conditions at the Waste Rock Storage Facility. A description of the sampling procedures of the waste rock prior to reclamation and the methods used to determine how the coal/rock ratio will not exceed 50/50 must be submitted for inclusion in the PAP.

UMC 817.97 Protection of Fish, Wildlife and Related Environmental Values - (BAS)

(a) Page 2-142-A must be updated to describe the schedule and areal coverage of aerial photogrammetry, as well as study methods and evaluation procedures used to document subsidence-induced changes to vegetation.

Page 2-107 must be updated to include results of the 1988 *Hedysarum occidentale* var. *canone* survey, conducted by the BLM. At the request of the U.S. Forest Service, please provide a map, showing the extent of the plant's population. Include a plan for monitoring mine-related impacts.

Please provide an update on current or future studies by Utah Power and Light Company (UP&L) or state or federal agencies documenting mule deer presence on lease areas. Of special concern are habitat losses and obstruction to migration corridors as a result of cliff spalling.

(d) Please identify areas of potential surface impacts for the new permit term. Consideration should be given to raptor nests, mule deer habitat, swallow nesting colonies, and populations of *Hedysarum occidentale* var. *canone*. Provide a mitigation plan, where appropriate.

The PAP must provide a commitment to control and suppress range, forest and coal fires to the extent possible.

(d)(4) Please update Appendix 16, Part II, entitled "Golden Eagle Nesting/Cliff Subsidence Monitoring Plan." Please reference the annual Cliff Subsidence and Eagle Monitoring Reports, and "Assessment of Mining Related Impacts in Newberry Canyon." Describe future monitoring plans and schedules. Include updated nest status information and field observations. Describe special purpose permit conditions and other pertinent agreements with state and federal agencies.

UMC 817.99 Slides and Other Damage - (PGL)

The applicant must commit to comply with any remedial measures required by the Division at any time a slide occurs which may have a potential adverse effect on health, safety, or the environment (page 3-73).

UMC 817.100 Contemporaneous Reclamation - (BAS)

A commitment must be incorporated in the interim reclamation plan (page 4-11 to 4-15) to reclaim as contemporaneously as practicable with mining operations.

UMC 817.101 Backfilling and Grading - (PGL)

A mass balance table must be submitted for the cut and fill that will be undertaken for the backfilling and grading of this site.

The Cottonwood Fan Portal reclamation must include a plan to cover the exposed coal seams with suitable material.

UMC 817.103 Backfilling and Grading: Covering Coal and Acid- and Toxic-Forming Materials - (HS)

Analysis of the waste rock indicates high SAR and Ec values (comments of Dan Duce in Mid-Term Review of November 3, 1986). Presently, Cell No. 7 of the Waste Rock Storage Site is operational; accordingly, analyses (the Division Guidelines for Management of Topsoil and Overburden, Table 6) must be submitted (sample procedures outlined in Appendix 7, page 11 of the PAP) prior to redistribution of topsoil atop the waste rock.

Additionally, the PAP (Appendix 7, page 11) states that the Rock/Coal ratio will not exceed 50/50. Please specify the procedures taken to determine this ratio.

The PAP states on page 4-6 that coal residue and coal will be covered with four feet of material. If the coal residue and coal is demonstrated to be non-acid and non toxic-forming, then only two feet of material is necessary to cover the above material. Please make revisions within the PAP to reflect this.

The PAP states (Appendix 7, page 11) that the waste rock storage site is designed to bury leachable and acid-forming substances. The Division requires four feet of suitable material to cap acid- and/or toxic-forming materials. The waste rock disposal plan is not acceptable for disposal of acid- and toxic-forming materials. Please review statement to reflect this.

The PAP also states (Appendix 7, page 11) that the waste rock is covered with two feet of non-coal fill. All drawings and plates depicting the Waste Rock Storage Site indicate 18 inches of non-coal cover. Please make necessary text changes or clarify discrepancy.

UMC 817.106 Regrading or Stabilizing Rills and Gullies - (HS)

The PAP states (page 4-6) that rills will be repaired, depending on size or nature of disturbance. This is an ambiguous statement. Please specify the depth at which rills will be stabilized, regraded, etc.

UMC 817.111 Revegetation: General Requirements - (BAS)

(b) According to page 4-16, the final revegetation plan may be revised to incorporate results from interim reclamation. The PAP must contain a commitment to obtain approval from the Division before any changes are made to the final revegetation plan.

UMC 817.112 Revegetation: Use of Introduced Species - (BAS)

Introduced species in the interim seed mix (page 4-13) must be replaced with native species, unless documentation is provided, which satisfy the requirements of this section.

UMC 817.113 Revegetation: Timing - (BAS)

The final revegetation plan (page 4-16 to 4-20) must include a commitment to adhere to the specific requirements of this section.

UMC 817.116 Revegetation: Standards for Success - (BAS)

(a) Please revise descriptions of sample adequacy and revegetation success on page 4-21.

Revegetation monitoring must meet new sample adequacy requirements. The formula for all vegetation parameters includes a one-tail "t" value at a 90 percent confidence interval with a 10 percent change in the mean.

Revegetation success will be achieved when ground cover, production and stocking levels are not less than 90 percent of the success standard (reference area), when tested at a 90 percent confidence interval (i.e., one-tail test with .10 alpha error).

The range condition of all reference areas at the Wilberg/ Cottonwood Mine must be reassessed to ensure these are in fair or better condition. The Soil Conservation Service (SCS) will perform this service without charge.

(b) Please be reminded that the Cottonwood Fan Portal Final Reclamation (1.8 acres) will be in its ninth year in 1990. Use of approved vegetation sampling methods and standards by a competent taxonomist will help facilitate a timely bond release.

(c)(2) The final reclamation monitoring schedule (page 4-20, and table following page 4-31) must be revised to conform to the Division's recommended monitoring schedule (refer to "Revegetation Guidelines for Utah Coal Regulatory Program", Table 1).

Page 4-21 under 7.a must be revised to state that reference areas will be sampled concurrent with final reclamation, using the same methodology (i.e., line intercept, point-quarter, and double-sampling for cover, density, and productivity, respectively).

UMC 817.131 Cessation of Operations - Temporary - (PGL)

The applicant must commit to meet the requirements of this section for inclusion in the PAP.

UMC 817.150 Roads: Class I - (BW)

The applicant must submit a legible copy of Plate 3-15 and all accompanying maps listed on that plate. All Class I haul roads must be designed, constructed, and certified by a registered professional engineer.

UMC 817.180 Other Transportation Facilities - (PGL)

The references to the railway must be deleted from the PAP. The references to the "temporary" Third East Portal Conveyor must be clarified.

An explanation as to how transportation and support facilities will prevent damage to fish, wildlife, and related environmental values must be included in the PAP.

djh
AT76/10-16
4/5/89