

4/2/92
see mine file
re: state through L. Grayson
cc P. Greenbaugh-Littig

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December 24, 1991

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**DIVISION OF
OIL GAS & MINING**

Dr. Dianne R. Nielson
Director
Division of Oil, Gas and Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, UT 84180-1203

RE: DIVISION ORDER #DO-91B SUBMITTAL, PACIFICORP ELECTRIC OPERATIONS, COTTONWOOD/WILBERG MINE, ACT/015/019

Dear Dr. Nielson:

In response to the above named Division Order dated November 25, 1991, PacifiCorp offers the following submittal. For clarity this submittal will follow the "Information required to be submitted" heading format on page 3 of the Division Order (attached).

Item 1, Page 1

Coal Mine Waste - 746.120

Coal mine waste will be placed in a controlled manner to minimize adverse effects of leachate and surface water runoff on surface and ground water quality and quantity.

Response: The coal refuse waste is placed within refuse berms as required by the permit in two-foot compacted lifts. Any leachate and surface effects are minimized by discharge requirements of the current NPDES permit. Though groundwater contamination is unlikely due to the strata the facility is built in, a well is monitored quarterly for verification at the site.

Item 2, Page 2

Refuse Pile - 746.212

Uncontrolled surface drainage may not be diverted over the outslope of the refuse pile. Runoff from areas above the refuse pile and runoff from the surface of the refuse pile will be diverted into stabilized diversion channels designed to meet the requirements of R614-301-742.300 to safely pass the runoff from a 100-year, 6-hour precipitation event. Runoff diverted from undisturbed areas need not be commingled with runoff from the surface of the refuse pile.

Response: At this time no drainage is being diverted over the outslope. Diversion ditches to catch future outslope drainage on the east and west edges of the refuse pile are to be constructed as the refuse reaches the ditch elevations. However, the permittee will commit to establishing the east diversion ditch as approved in the permit by February 28, 1992. This date may have to be extended due to weather and ground conditions. The west diversion ditch will be constructed per the permit from the pond to the current elevation of the refuse. This ditch will continue to lengthen as the refuse elevation advances. The area above the refuse will continue to be diverted by the current initial diversion ditch.

746.221

Slope protection will be provided to minimize surface erosion at the site. All disturbed areas, including diversion channels that are not riprapped or otherwise protected will be reregulated upon completion of construction.

Response: Diversions not riprapped will be seeded with the approved seedmix during the fall planting season of 1992.

746.222

No permanent impoundments will be allowed on the completed refuse pile. Small depressions may be allowed by the Division if they are needed to retain moisture, minimize erosion, create and enhance wildlife habitats, or assist revegetation, and if they are not incompatible with stability of the refuse pile.

Response: The refuse pile is under construction, not completed. Only the refuse berm outsoles are completed as discussed in item 3 of this submittal.

746.330

Drainage control. Runoff from areas above the disposal facility or runoff from the surface of the facility that may cause instability or erosion of the impounding structure will be diverted into stabilized diversion channels designed to meet the requirements of R614-301-742.300 and designed to safely pass the runoff from a 100-year, 6-hour design precipitation event.

Response: Permittee has committed in item 2, regulation 746.212 response to establishing the west and east diversion ditches per the permit design. Permittee also commits to having a stability/erosion analysis run on saturated refuse to determine if runoff may cause instability or erosion of the impounding structure. This analysis will help determine the stability and safety of the reclaimed refuse berm outslope in the area of the sediment pond. Analysis will be completed by March 31, 1992.

Item 3, Page 2

Backfilling and Grading - 553.251

The final configuration for the refuse pile will be suitable for the approved postmining land use. Terraces may be constructed on the outslope of the refuse pile if required for stability, control of erosion, conservation of soil moisture, or facilitation of the approved postmining land use. The grade of the slope between terrace benches will not be steeper than 2h:lv (50 percent).

Response: The seeded refuse berm outslope is at the final configuration. Terraces were constructed on the outslope for stability, control of erosion, conservation of soil moisture, and facilitation of the approved postmining land use. The grade of the outslope between terraces is 2h:lv.

Item 4, Page 3

Sediment Pond - 742.220

Response: The permittee's sediment pond at the waste rock storage facility meets all the requirements of 742.220.

There are concerns as to how the sediment from the coal mine's sediment ponds is disposed of. The permittee committed to changing the disposal practice during the recent Des-Bee-Dove sediment pond cleaning project. The permittee commits to reevaluating the disposal practice of the sediment from the sediment pond cleanings during the next submittal of a cleaning plan.

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The permittee will implement the committed time table of item 2 (746.212, 746.221, 746.330) after plan approval from the Division.

The permittee requests an extension of R614-300-200's thirty-day notification right to request a hearing due to the Division order's deadline being past thirty days of issuance.

If there are any questions, please contact me at 220-4584 or Guy Davis at 653-2312.

Sincerely,

Guy Davis (for)

J. Blake Webster
Permitting Administrator

DGD/sh
Attachment