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DIVISION OF
OIL GAS & MINING

Coal Program

ACT/015/019 #2

Copy Joe, PAM, Joe, Susan

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(U-065)

Moab District
P.O. Box 970
Moab, Utah 84532

JUL 26 1991

CERTIFIED MAIL - RETURN RECEIPT REQUESTED
Certified No. 0525

Mr. Scott M. Child
PacifiCorp Electric Operations
Fuel Resources Department
324 South State Street
P. O. Box 26128
Salt Lake City, Utah 84126-0128

Dear Mr. Child:

Notice of Noncompliance
Order to Replug Drill Hole TMTN-7

On July 23, 1991, Tom Rasmussen of the Bureau of Land Management (BLM) witnessed the plugging of drill hole TMTN-7 located at T. 17 S., R. 6 E., Section 15. This inspection revealed that PacifiCorp was in noncompliance for failure to follow proper plugging procedures.

The information obtained at the site indicates that the subject hole was drilled to a depth of 1960 feet. After the hole was completed, approximately 235 bags of cement were mixed with water, in an inconsistent manner, and pumped through tubing into the hole. This cement mixture never reached the top of the hole and simple volumetric calculations indicate that the amount applied was substantially deficient to reach the surface. As an attempt to plug the top of the hole, empty cement bags and plastic covers from pallets were tamped into the surface casing for a distance of about 20 feet and filled with a cement slurry.

Incomplete plugging of the hole is a violation of stipulation number 4 of the approved exploration plan. This stipulation states that upon completion of down-hole procedures, all drill holes shall be properly sealed by emplacing cement through tubing from the bottom of the hole to the collar. There is also a clear violation of the regulations of 43 CFR 3484.1(a)(3). Which requires a suitable plugging material as a drill hole cap and exploration activity is managed to prevent water pollution and mixing of ground and surface waters and ensure the safety of people, livestock, and wildlife. The trash used by PacifiCorp in the cap is a potential source of pollutants which can deteriorate and ultimately cause surface collapse of the hole. In addition, our experience has shown that leaving a void in an abandoned drill column invites weathering and disintegration of the casing which will eventually allow migration of ground and surface water.

To satisfy this noncompliance, PacifiCorp must remove the substandard drill hole cap and fill the remainder of the hole with cement through a tube from the bottom to the surface by August 3, 1991. Furthermore, the action taken by PacifiCorp on this hole has raised serious concern about the plugging adequacy of the 6 holes drilled during 1990 under another exploration license. Therefore, within 5 days, PacifiCorp must also arrange a meeting with the BLM to determine what additional action is necessary to ensure the proper plugging of these other holes. Failure to comply with this order will result in the cessation of further exploration operations, cancellation of the license, and the initiation of bond forfeiture.

Please contact Gary Johnson in the Price Coal Office at (801) 637-4584 regarding any aspect of this noncompliance.

Sincerely yours,

/S/ WILLIAM C. STRINGER

Assistant District Manager
Mineral Resources

cc:
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U-921
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