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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

February 4, 1992

Mr. Val Payne, Sr. Environmental Engineer  
PacifiCorp Electric Operations  
P.O. Box 1005  
Huntington, Utah 84528

Dear Mr. Payne:

Re: Request for Information, Midterm Review, PacifiCorp Electric Operations,  
Cottonwood/Wilberg Mine, ACT/015/019, Folder #2, Emery County, Utah

The Division requests that PacifiCorp Electric Operations submit updated legal and financial information (R645-301-110 through R645-301-114) for the midterm review, as well as the information that is outlined on the attached memorandum.

Please submit this information by March 6, 1992.

Sincerely,

A handwritten signature in cursive script that reads "Pamela Grubaugh-Littig".

Pamela Grubaugh-Littig  
Permit Supervisor

jbe

Enclosure

cc: Henry Sauer

015019MT



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February 3, 1992

TO: Pamela Grubaugh-Littig, Permit Supervisor

FROM: Jesse Kelley, Reclamation Engineer *JK*

RE: Midterm Review, PacifiCorp Electric Operations, Cottonwood/Wilberg Mine, ACT/015/019, Folder #2, Emery County, Utah

## Synopsis

The midterm review of this permit was begun by letter from the Division on September 17, 1991. This memorandum constitutes this writer's review of the PAP and points out a number of problems which the operator must resolve in order to bring the PAP into compliance with the R614 (now R645) rules.

## Analysis

This writer finds the following deficiencies in the PAP:

1. Plate 2-14 must be certified by a qualified, registered, professional engineer or land surveyor (see R645-301-512.140).
2. Plate 3-14 must be certified by a qualified, registered, professional engineer or land surveyor (see R645-301-542.310).
3. Plate 4-3 must be certified by a qualified, registered, professional engineer or land surveyor (see R645-301-521.151).
4. Plate 4-7 must be certified by a qualified, registered, professional engineer or land surveyor (see R645-301-542.310).
5. Plate 4-8 must be certified by a qualified, registered, professional engineer or land surveyor (see R645-301-512.140).

6. Plate 4-9 must be certified by a qualified, registered, professional engineer or land surveyor (see R645-301-512.140).
7. Plate 3-7 must be certified by a qualified, registered, professional engineer (see R645-301-512.250).
8. Plate 3-8 must be certified by a qualified, registered, professional engineer (see R645-301-512.250).
9. Plate 3-11 must be certified by a qualified, registered, professional engineer (see R645-301-512.250).
10. The operator must commit to certifying the sedimentation ponds on a annual basis (see R645-301-514.311). At present, the operator is only committed to quarterly pond inspections (pages 3-32 to 3-33).
11. The PAP must classify each road as either primary or ancillary (see R645-301-527.100) and demonstrate that all roads comply with the road criteria of R645-301-527 and R645-301-534.
12. The PAP must contain a demonstration that the sedimentation pond embankments have a static safety factor of at least 1.3 for normal pool with steady state seepage saturation conditions (see R645-301-533.100).
13. The PAP must contain a demonstration that the road embankments have a static safety factor of at least 1.3 (see R645-301-534.130).

### Recommendation

It is recommended that the operator correct the problems listed in the above analysis.