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January 4, 1993

TO: Pamela Grubaugh-Littig, Permit Supervisor

FROM: Jess Kelley, Reclamation Engineer *JK*

RE: Approval of Submittal Made Pursuant to Midterm Review, PacifiCorp, Cottonwood/Wilberg Mine, ACT/015/019, Folder #2, Emery County, Utah

SYNOPSIS

In February of 1992, the Division conducted a midterm review of the Mine Plan for this site. This writer found a number of deficiencies in the Mine Plan, all but three of which were addressed in the permittee's initial response to the review, which the Division received on February 3, 1992. The first of the three deficiencies which were not addressed in the initial response was the fact that the roads at this site had not been classified as either primary or secondary. The other two deficiencies had to do with the lack of adequate demonstration of stability of the sedimentation pond embankments and of the road embankments.

On December 11, 1992, the permittee submitted, for Division approval, revisions to the Mine Plan to address the last of the deficiencies found during the midterm review. This memorandum constitutes this writer's review and approval of the December 11th submittal.

ANALYSIS

The December 11th submittal identifies five roads at this site, all of which are classified as primary roads:

- a. Haul Road
- b. Truck Turnaround
- c. Service Road
- d. Portal Road
- e. Fan Access Road

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The December 11th submittal includes Appendix XI, which demonstrates the stability of the sediment pond embankments and the roads. Appendix XI uses existing material property data for the material in the various embankments in a standard, circular failure analysis of those embankments. The stability safety factors obtained by this analysis are summarized on page 1 of Appendix XI. All are well above the value of 1.3 required by the R645 rules.

The December 11th submittal completely and adequately corrects the deficiencies listed in the February 3, 1992 midterm review memorandum.

RECOMMENDATIONS

It is recommended that the December 11th submittal be approved by the Division as correcting the deficiencies found during the 1992 midterm review.

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