



May 13, 1997

Department of Natural Resources  
Division of Oil, Gas and Mining  
1594 West North Temple, Suite 1210  
P. O. Box 145801  
Salt Lake City, Utah 84114-5801

Attention: Mr. Daron R. Haddock

*Copy Aaron  
Fax Billoppo*

**Re: Midterm Review, Cottonwood Canyon Fan Portal, PacifiCorp, Cottonwood Mine, ACT/015/019, Folder # 2 Emery County, Utah**

PacifiCorp, by and through its wholly-owned subsidiary, Energy West Mining Company ("Energy West") as mine operator, herewith submit a response to the Midterm review, Technical Analysis and onsite evaluation for the Proposed Cottonwood Canyon Fan Portal Area Reclamation.

It was originally PacifiCorp's intent to reply to the TA deficiencies as received from the Division, but after the onsite evaluation of the above mentioned area it was determined that only certain sections of the deficiencies could be adequately answered or satisfied. This determination is due to the difference in opinion between PacifiCorp and the Division on what is necessary and feasible to accomplish on final reclamation requirements and permit declarations on the highwall responsibility. It has been stated by the Division that additional material be utilized, involving disturbance of the already reclaimed material below the site location which would require extensive re-evaluation of design, time, quantity calculations, and more budgeted funds to accomplish the changes. To properly engineer and design and appropriate additional money means that the decision to reclaim for the 1997 construction year would not be feasible and an extension of time beyond this year would be necessary.

PacifiCorp, at this time requests an extension of time to better evaluate the majority of the deficiencies based on a clearcut decision that will dictate the direction Energy West should pursue for final reclamation. This decision needs to be made with the involvement of all interested parties. It is requested that an additional onsite meeting with the Division, Office of Surface Mining and Energy West take place in the near future. A scheduled time determined by the Division.

Energy West is now in the process of resurveying the area in question and will define in place areas to be reclaimed according to recommendations of the last onsite meeting.

Huntington Office:  
(801) 687-9821  
Fax (801) 687-2695  
Purchasing Fax (801) 687-9092

Deer Creek Mine:  
(801) 381-2317  
Fax (801) 381-2285

Cottonwood Mine:  
(801) 748-2319  
Fax (801) 748-2380

The Bonding and Insurance Requirement Deficiencies have been addressed and the following pages 4-30 through 4-31.39 are now submitted for review to determine if satisfactory by the Division. If found satisfactory to the Division an amendment to the permit will be submitted to replace pages 4-30 through 4-36.

In reference to the 69kV transmission line, this line is maintained to the substation by Utah Power and Light Co. and the permit states that they will be responsible for the removal of such. This reflects a recent decision on the incoming transmission line at the Rilda Canyon surface facilities and the public utility having jurisdiction to the substation.

The soils resource information has been discussed with Robert Davidson and some resolve accomplished, information found in Appendices III of the permit, will better qualify the needs of the regulations as set forth. The remaining deficiencies will be addressed when final reclamation issues are clearly defined. At that time all deficiencies will be re-submitted for your review and approval.

Energy West is in the process of searching through the permit to clarify all statements concerning the original proposed fan portal area, in so doing will eliminate any questions that refer to the area and any indications of a portal at that location. At the same time all information will be collected into one appendix which will make for ease of review in the future.

Please advise on the above mentioned issues.

Thank You for your time and considerations on these important reclamation issues.

Sincerely,



Charles A. Semborski  
Geology/Environmental Supervisor