

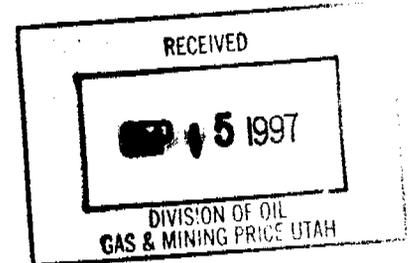


Division

September 10, 1997

Utah Coal Regulatory Program
Division of Oil, Gas and Mining
451 East 400 North
Box 156
Price, Utah 84510

976



Attn: Bill Malencik

Re: Amendment to Cottonwood/Wilberg Mine Permit for Final Reclamation of the Channel Canyon Portals of the Cottonwood Mine, PacifiCorp, Cottonwood/Wilberg Mine, ACT/015/019, Emery County Utah

PacifiCorp, by and through its wholly-owned subsidiary, Energy West Mining Company ("Energy West") as mine operator, hereby submits an amendment regarding the above subject matter.

According to Volume 2, Part 4, of the Cottonwood/Wilberg Coal Mining Permit, two sets of seals were to be constructed at the Channel Canyon Portals. The first set were constructed in December 1990 approximately 25 feet from the outcrop. The seals were inspected and approved on May 13, 1997 (see attached approval letter). An additional set of seals were to be constructed at the outcrop to conform with the near vertical slope.

On August 1, 1997, the reclamation of the outcrop seals at the Channel Canyon portals was completed. The reclamation work took two days and included building additional seals at the outcrop, brushing black tar over the front of the seal to blend in with the natural environment, removing walkway and escape structures, and removing any refuse leftover from the reclamation processes. All materials were flown in and out by helicopter due to the remoteness of the portals. A photo essay is included to show how the work progressed and the final outcome of the reclamation procedures. Revisions to the Permit are as follows:

Pages:

1. page 3-6, Volume 2 (highlighted)
2. page 3-7, Volume 2 (highlighted)
3. page 4-1, Volume 2 (highlighted)
4. page 4-1.1, Volume 2 (highlighted)

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

Utah Coal Regulatory Program
September 10, 1997
Page Two

Drawings:

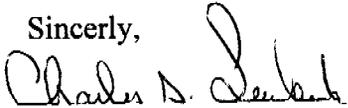
1. Drawing CM-10807-WB, Plate 3-1 of the Life of Mine Plan in Five Year Increments

Unless an unforeseen item has been neglected, all parameters necessary to this amendment have been covered and are complete.

In addition to this amendment, an application for reclamation release of the affected portal area will be filed with the Division. Phase I and Phase II reclamation is not applicable in the case of the Channel Canyon breakouts since the affected area occurs on a solid sandstone escarpment. Phase III of the reclamation was completed as described above for final reclamation.

Jesse Kelley from the Division has been contacted to inspect and make comments on the reclamation work. If you have any questions or concerns regarding the work performed in Channel Canyon, please feel free to contact me at 687-4720.

Sincerely,



Charles A. Semborski
Geology/Environmental Supervisor

enclosures

cc Carl Pollastro
John Christensen
Chuck Semborski
Blake Webster, Interwest Mining
Scott Child, Interwest Mining
Barbra Adams (File)

PERMIT TRACKING FORM

- Permit Amendment(INS)
 Exploration Permit(INS)
 N.O.V. (INS)
 D.O.
 Permit Transfer
 Incidental Boundary Change
 Permit Midterm (MT)
 Permit Renewal (PR)
 New Permit
 Significant Revision (SR)
 Bond Release (BR)

| | | | |
|---|----------------------------|-----------------------------------|--|
| DATE RECEIVED 9-15-97 | By: _____ (Initial) | PERMIT NUMBER ACT1015/019- | |
| Title of Proposal: Channel Canyon Portals | | PERMIT CHANGE # 976 | |
| Description: Installation of additional seals at outcrop for completion of final reclamation | | PERMITTEE Pacific Corp | |
| # Copies Required 7 | # Copies Received 7 | MINE NAME Cottonwood | |

PERMIT CHANGE APPLICATION SENT TO SLC DATE: _____ LETTER TO PERMITTEE: _____

| | | | |
|--|----------------------|-----------|----------------------|
| <input type="checkbox"/> 15 DAY INITIAL RESPONSE TO PERMIT CHANGE APPLICATION OR INITIAL COMPLETENESS REVIEW | DATE DUE 9/30 | DATE DONE | LETTER TO PERMITTEE: |
|--|----------------------|-----------|----------------------|

| | | | |
|---|-----------|-----------|--------------------------|
| <input type="checkbox"/> Notice of Affidavit of Publication. (If change is a Significant Revision, New Permit or Permit Transfer) | DATE DUE: | DATE DONE | PUBLIC COMMENT RECEIVED: |
|---|-----------|-----------|--------------------------|

| PRICE REVIEW TRACKING <i>all 9/18</i> <i>Sent to SLC for assignments</i> | REVIEW | | SLC REVIEW TRACKING | REVIEW | |
|--|--------|------|---|--------|--------------------------|
| | DUE | DONE | | DUE | DONE |
| <input checked="" type="checkbox"/> Lead <input type="checkbox"/> Generalist | | | <input type="checkbox"/> Lead | | |
| <input type="checkbox"/> Administrative | | | <input type="checkbox"/> Administrative | | |
| <input type="checkbox"/> Land Use/AQ | | | <input type="checkbox"/> Land Use/AQ | | |
| <input type="checkbox"/> Biology | | | <input type="checkbox"/> Biology | | |
| <input type="checkbox"/> Engineering | | | <input type="checkbox"/> Engineering <i>JVK</i> | | <i>field review 9/30</i> |
| <input type="checkbox"/> Geology | | | <input type="checkbox"/> Geology | | |
| <input type="checkbox"/> Soils | | | <input type="checkbox"/> Soils | | |
| <input type="checkbox"/> Hydrology | | | <input type="checkbox"/> Hydrology | | |

| | | | | |
|---------------|-------|---|-------|--|
| TA Review Due | Date: | Permittee Response Due <input type="checkbox"/> Stipulation <input type="checkbox"/> Condition <input type="checkbox"/> No Requirements | Date: | DIVISION DECISION LETTER <input type="checkbox"/> APPROVE <input type="checkbox"/> DENY |
|---------------|-------|---|-------|--|

| | | | | |
|----------------|-------|-------------------|-------|-------|
| TA Review Done | Date: | Response Received | Date: | Date: |
|----------------|-------|-------------------|-------|-------|

| COORDINATED REVIEWS | PHONE CONTACT | SENT | DUE | RECEIVED | ADDITIONAL TRACKING | Date: |
|--|---------------|-------------|-----|----------|---------------------------------|-------|
| <input type="checkbox"/> OSMRE | | 2/23 | | | PUBLIC HEARING | |
| <input type="checkbox"/> US Forest Service | | | | | LETTER FROM COMPLIANCE SUPER. | |
| <input type="checkbox"/> BLM | | | | | AVS COMPLETED | |
| <input type="checkbox"/> US FWS | | | | | APPROVAL EFFECTIVE DATE | |
| <input type="checkbox"/> US NPS | | | | | APPROVED COPY TO FILE | |
| <input type="checkbox"/> UT SHPO | | | | | APPROVED COPY TO PERMITTEE | |
| <input type="checkbox"/> UT DEQ | | | | | APPROVED COPY TO PFO/SLC | |
| <input type="checkbox"/> UT Water Rights | | | | | APPROVED COPY TO AGENCIES | |
| <input type="checkbox"/> UT Wildlife Resources | | | | | CHIA MODIFIED | |
| <input type="checkbox"/> UT SITLA | | | | | UPDATE MASTER TA DONE/NEEDED | |

| | |
|--|----------------------|
| PRICE FIELD OFFICE COMMENTS: <i>Nothing can be done on this amendment until an interdisciplinary field review is conducted. See WSM memo to file, attached hereto which makes certain proposals. Proposed dates for field trip 9/22 or 9/23 or thereafter October if practical.</i> | SLC OFFICE COMMENTS: |
|--|----------------------|

orientation of the breakout entries, any mine water produced near the breakouts would then flow down-dip into the mine rather than flowing out of the portals.

There will not be any surface impacts other than the 8 feet by 20 feet breakouts themselves, and the escape ladder.

The breakout portals will be sealed upon abandonment of the 4th South Main entries scheduled in 1992.

Permanent portal seals, consisting of double wide concrete block walls will be placed approximately 25 feet from the outcrop. All work will be performed from within the mine and nothing in the way of coal, rock or waste materials will be placed down the canyon. The escape ladder and cable handrail are scheduled to remain to allow mine personnel access to the portals from monitoring purposes, but will be removed during final reclamation. Also during final reclamation, additional seals will be installed to conform with the near vertical slope at the outcrop.

MINING METHOD

Continuous Mining Units

The principle purpose for continuous mining units in Cottonwood Mine is development; i.e., driving main entries, opening headgates, tailgates, bleeder and setup entries for the longwall panels.

Figure 2 illustrates the basic configuration of the main entries. A six-entry system is planned for the main headings with

SUPERSEDED
EFFECTIVE:
MAY 18 1998
UTAH DIVISION OIL, GAS AND MINING
3-7

AMENDMENT TO
APPROVED Mining & Reclamation Plan
Approved, Division of Oil, Gas & Mining

by JK 92D date 8/14/92

RECLAMATION PLAN

Structure Removal

Once mining has ceased, estimated 2022, the surface facilities will be dismantled and removed from the permit area.

Starting at the mine portals, all belt lines, crushing and screening systems, electrical systems, truck laded surface building and fan installations will be torn down and hauled from the permit area.

The concrete silo will be torn down, broken up and buried against the east highway cut in the lower parking lot. All other concrete foundations that would be above final grade will be removed and buried with the silo material.

Portal Sealing

Final stages of mining (second mining), as pillars are extracted near the portal entrances inside, office and warehouse facilities will be dismantled and portal sealing will begin. Wilberg's portal entries are all updip of the extracted seam and require no drains or special hydrological containment seals except the proposed Cottonwood fan portal drainage (see Protection of the Hydrological Balance section). Seals are proposed as shown on Figure 1.

SUPERSEDED
EFFECTIVE:
MAY 18 1998
UTAH DIVISION OIL, GAS AND MINING

Because of their remote and inaccessible location from the surface, the following portals and breakouts will have to be completed from inside the mine. Channel Canyon, 7th West "Miller Canyon", Cottonwood Mine belt portal. The Channel Canyon escape ladder will remain to allow mine personnel access to portals for

INCORPORATED
EFFECTIVE:
Revised 6/13/97
MAY 18 1998 4-1
UTAH DIVISION OIL, GAS AND MINING
97C

monitoring purposes but will be removed during final reclamation. Also during final reclamation, additional seals will be installed to conform with the near vertical slope at the outcrop.

AMENDMENT TO
APPROVED Mining & Reclamation Plan
Approved, Division of Oil, Gas & Mining

SUPERSEDED
EFFECTIVE:
MAY 18 1998
UTAH DIVISION OIL, GAS AND MINING

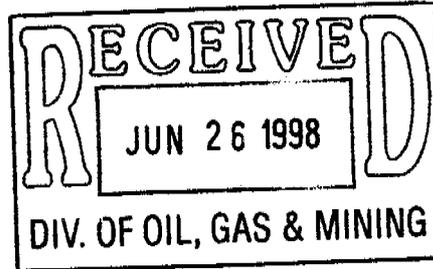
JK _____ 92D date 8/14/92

4-1.1
ADDED 7/20/92



June 24, 1998

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



Attn: Pam Grubaugh-Littig

Re: Clean Copies of the Phase III Bond Release, Channel Canyon Portal Breakouts, PacifiCorp, Cottonwood/Wilberg, ACT/015/019-BR97G, Folder #3, Emery County, Utah.

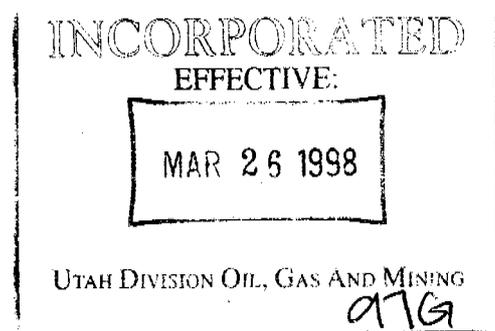
Attached is seven copies of the "clean" version of the above mentioned amendment. Please place the approved Division of Oil Gas and Mining stamp on these pages and map for distribution and insertion into our Cottonwood/Wilberg MRP.

If you have any questions or concerns involving this amendment, please feel free to contact Dennis Oakley at 687-4825 or myself at 687-4720.

Sincerely,

Chuck Semborski
Permitting/Geology Supervisor

cc: Carl Pollastro
Dennis Oakley
Blake Webster



J:\PCCOMMON\PCCOMMON\ENVIRONM\PERMITS\CTWMINE\AMENDMNT\1998\CHNLCLN.COR

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

APPLICATION FOR PERMIT PROCESSING

| | | | | | | |
|---|-------------------------------------|----------------------------------|-----------------------------------|--------------------------------------|---------------------------------------|----------------------------|
| Permit Change <input checked="" type="checkbox"/> | New Permit <input type="checkbox"/> | Renewal <input type="checkbox"/> | Transfer <input type="checkbox"/> | Exploration <input type="checkbox"/> | Bond Release <input type="checkbox"/> | Permit Number: ACT/015/019 |
| Title of Proposal: Channal Canyon Portals Reclamation | | | | | | Mine: COTTONWOOD/ WILBERG |
| | | | | | | Permittee: PACIFICORP |

Description, include reason for application and timing required to implement: **Description: Installation of additional seals at outcrop for completion of final reclamation**
Reason: to show this completed reclamation in the Cottonwood/Wilberg permit

Instructions: If you answer yes to any of the first 8 questions (gray), submit the application to the Salt Lake Office. Otherwise, you may submit it to your reclamation specialist.

- | | | |
|---|--|--|
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 1. Change in the size of the Permit Area? _____ acres Disturbed Area? _____ acres <input type="checkbox"/> increase <input type="checkbox"/> decrease. |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 2. Is the application submitted as a result of a Division Order? DO # |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 3. Does application include operations outside a previously identified Cumulative Hydrologic Impact Area? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 4. Does application include operations in hydrologic basins other than as currently approved? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 5. Does application result from cancellation, reduction or increase of insurance or reclamation bond? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 6. Does the application require or include public notice/publication? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 7. Does the application require or include ownership, control, right-of-entry, or compliance information? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 8. Is proposed activity within 100 feet of a public road or cemetery or 300 feet of an occupied dwelling? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 9. Is the application submitted as a result of a Violation? NOV # |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 10. Is the application submitted as a result of other laws or regulations or policies? Explain: |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 11. Does the application affect the surface landowner or change the post mining land use? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 12. Does the application require or include underground design or mine sequence and timing? (Modification of R2P2?) |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 13. Does the application require or include collection and reporting of any baseline information? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 14. Could the application have any effect on wildlife or vegetation outside the current disturbed area? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 15. Does application require or include soil removal, storage or placement? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 16. Does the application require or include vegetation monitoring, removal or revegetation activities? |
| <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | 17. Does the application require or include construction, modification, or removal of surface facilities? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 18. Does the application require or include water monitoring, sediment or drainage control measures? |
| <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | 19. Does the application require or include certified designs, maps, or calculations? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 20. Does the application require or include subsidence control or monitoring? |
| <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | 21. Have reclamation costs for bonding been provided for? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 22. Does application involve a perennial stream, a stream buffer zone or discharges to a stream? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 23. Does the application affect permits issued by other agencies or permits issued to other entities? |

Attach 7 complete copies of the application.

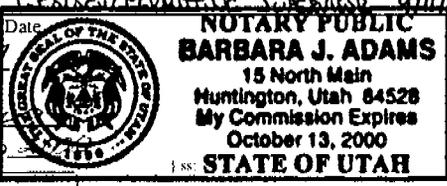
I hereby certify that I am a responsible official of the applicant and that the information contained in this application is true and correct to the best of my information and belief in all respects with the laws of Utah in reference to commitments, undertakings, and obligations, herein. (R645-301-113)

Signed - Name - Position - Date
Barbara J. Adams Council/President Supervisor 9/11/97

Subscribed and sworn to before me this 9th day of Sept 19 97

Barbara J. Adams
 Notary Public

My Commission Expires: 10-13
 Attest: STATE OF UTAH



RECEIVED
Received by Oil, Gas & Mining

SEP 15 1997

DIVISION OF OIL
GAS & MINING PRICE UTAH

ASSIGNED TRACKING NUMBER
976

U. S. Department of Labor

Mine Safety and Health Administration
P.O. Box 25367
Denver, Colorado 80225-0367



Coal Mine Safety and Health
District 9

JUL 10 1997

Kent Norton
Manager, Health, Safety and Training
Energy West Mining Company
P. O. Box 310, 15 N. Main
Huntington, UT 84528

RE: Trail Mountain Mine
ID No. 42-01211
Channel Canyon Breakouts

Dear Mr. Norton:

The letter dated January 14, 1997, consisting of a cover letter, a detailed drawing of Channel Canyon breakouts, and a location map, requested MSHA to examine the seals at the two drift openings for compliance with federal regulations.

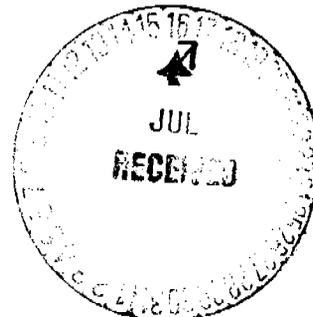
On Tuesday, May 13, 1997, James A. Martin, Coal Mine Inspector, traveled to the site and found that the seals in these two entries do satisfy the regulations in 30 CFR 75.1711.

If you have any questions, please contact this office at 303/231-5462.

Sincerely,

Wickie A. Vigil
for John A. Kuzar
District Manager

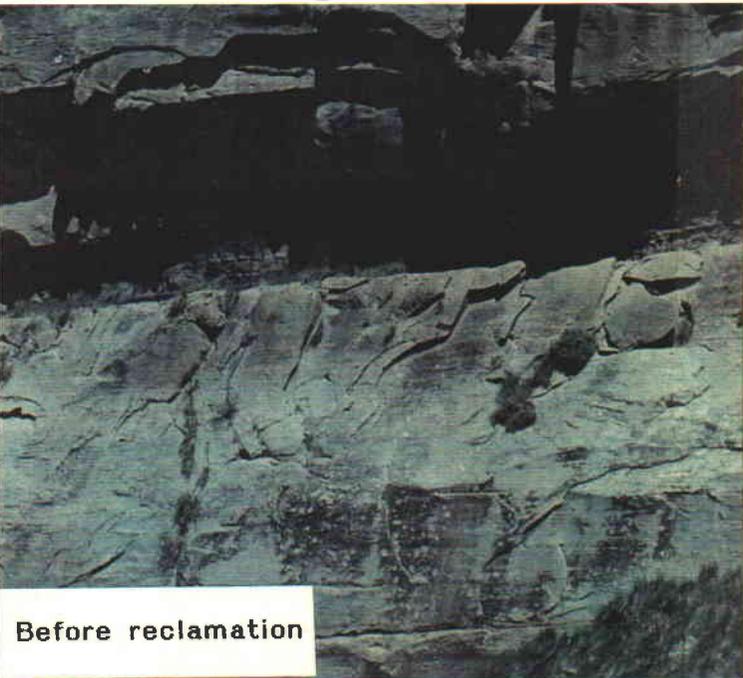
Enclosure



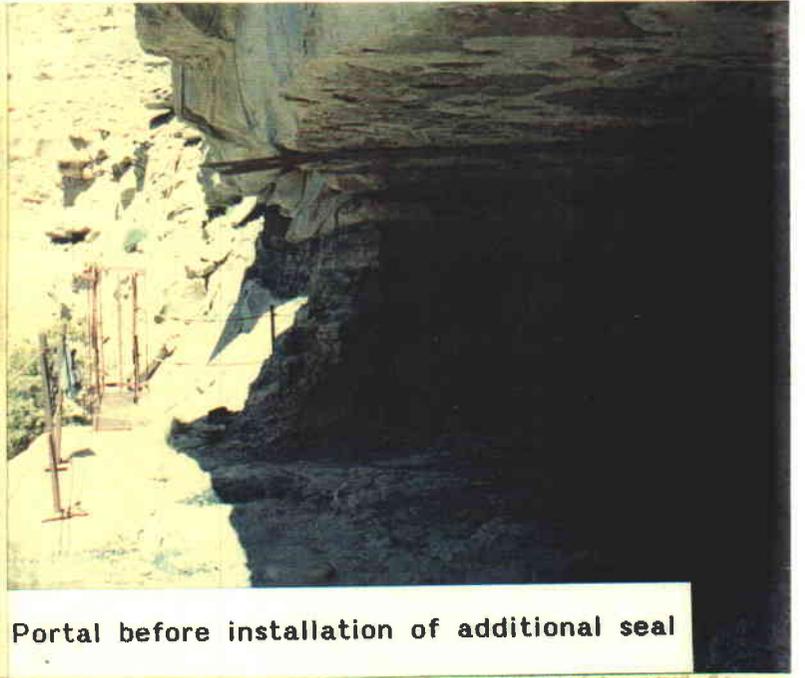


Channel Canyon Portals Reclamation Project

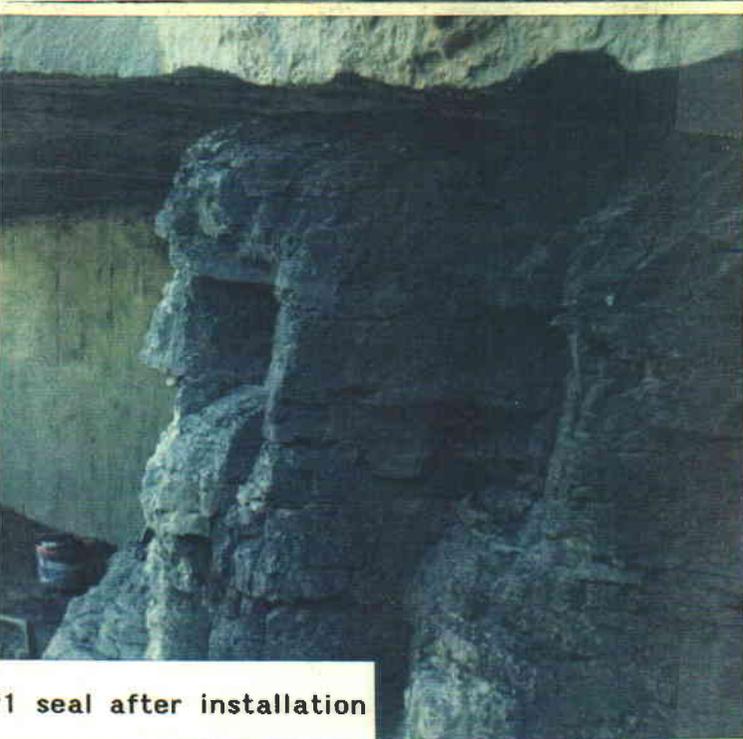
Completed 8/1/97



Before reclamation



Portal before installation of additional seal



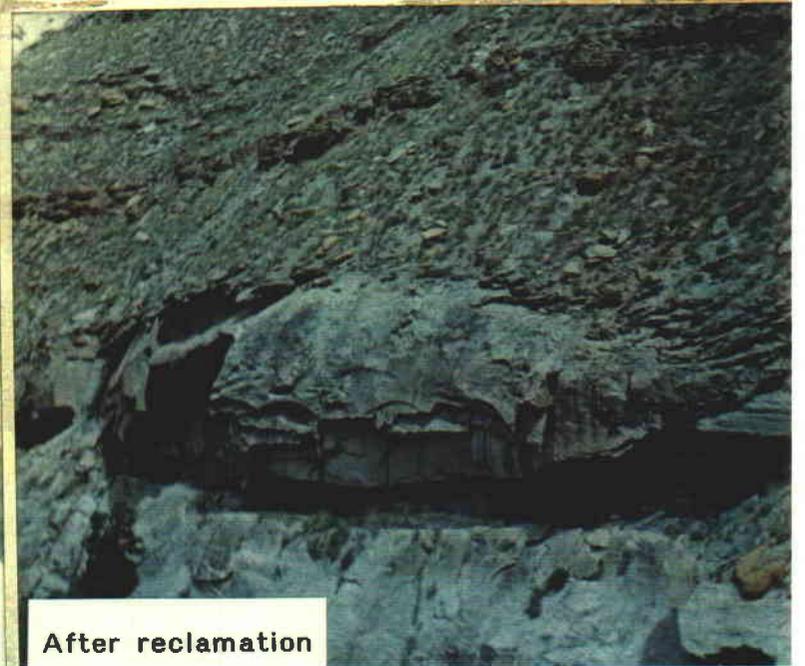
#1 seal after installation



#2 seal after installation



Seal after tar application



After reclamation

RECLAMATION PLAN

Structure Removal

Once mining has ceased, estimated 2022, the surface facilities will be dismantled and removed from the permit area.

Starting at the mine portals, all belt lines, crushing and screening systems, electrical systems, truck laded surface building and fan installations will be torn down and hauled from the permit area.

The concrete silo will be torn down, broken up and buried against the east highway cut in the lower parking lot. All other concrete foundations that would be above final grade will be removed and buried with the silo material.

Portal Sealing

Final stages of mining (second mining), as pillars are extracted near the portal entrances inside, office and warehouse facilities will be dismantled and portal sealing will begin. Wilberg's portal entries are all updip of the extracted seam and require no drains or special hydrological containment seals, ~~except the Cottonwood fan portal drainage~~ (see Protection of the Hydrological Balance section). Seals are proposed as shown on Figure 1.

Because of their remote and inaccessible location from the surface, the following portals and breakouts will have to be completed from inside the mine: Channel Canyon, 7th West "Miller Canyon", Cottonwood mine belt portal. ~~The Channel Canyon escape ladder will remain to allow mine personnel access to portals for monitoring purposes but will be removed during final reclamation. Also during final reclamation, portals were sealed approximately 25 feet in by the outcrop and the additional seals for final reclamation was completed August 1, 1997. The Cottonwood Mine belt portal will be sealed sometime in the future. Final reclamation involved installing~~

Revised 7/20/92

Revised 8/13/97

additional seals ~~will be installed~~ to conform with the near vertical slope at the outcrop.

Revised 7/20/92

Revised 8/13/97

4-1.1

area is considered. Subsequent mining in a lower seam is not considered since the area has already been affected.

CHANNEL CANYON INTAKES

A two-entry intake breakout from the Hiawatha Seam was completed November 3, 1989, to provide additional ventilation for the Cottonwood Mine.

This breakout is located in the NW 1/4 of Section 32, T17S, R7E, SLBM, and was accomplished by developing a three entry system west of the 4th South Mains on 100 foot by 100 foot centers for 700 feet and then driving two entries in a southerly direction for approximately 200 feet, then breaking out into "Channel" Canyon. See mine plan Drawing CM-10807-WB. All work was performed from within the mine, minimizing downcasting of coal, rock, or waste materials down the canyon walls.

Each portal size is approximately 8 feet high by 20 feet wide and ~~upon completion they were fenced with chain link to prevent entry and warning signs were posted.~~ ~~was permanently sealed approximately 25 feet in by the outcrop in December, 1991. The permanent seals are discussed later in this section. Final reclamation took place August 1, 1997 where additional seals were placed at the coal outcrop and coated with a black tar to blend in with the existing coal outcrop.~~

These breakouts ~~will be~~ were used primarily as ventilation entries and ~~will~~ did not have a portal pad.

As required by MSHA, these portals ~~will be~~ were designated as an emergency escapeway and, ~~therefore, they will~~ were require to provide an access from the portal level into the canyon. If, in the case of an emergency which would cut off all other routes of escape and these portals were used, the personnel could make their way to the canyon floor via a cable hand rail and ladder mounted on the rock ledge below the coal seam. ~~Since final reclamation has been completed on the Channel Canyon breakouts, there is no longer an escape route from these portals. The cable hand rail and ladder were removed.~~

The Hiawatha coal seam, at ~~this proposed~~ the breakout, dips downward towards the northwest at a 2% slope. Due to the southern orientation of the breakout entries, any mine water

Revised 5/1/90
Revised 8/13/97

produced near the breakouts would ~~then have~~ flowed down-dip into the mine rather than flowing out of the portals.

There ~~will~~ were not be any surface impacts other than the 8 feet by 20 feet breakouts themselves, and the escape ladder.

~~The breakout portals will be sealed upon abandonment of the 4th South Main entries scheduled in 1992.~~

Permanent portals seals, consisting of double wide concrete block walls ~~will be~~ were placed approximately 25 feet from the outcrop. All work ~~will be~~ was performed from within the mine and nothing in the way of coal, rock or waste materials ~~will be~~ were placed down the canyon. ~~The escape ladder and cable handrail are scheduled to remain to allow mine personnel access to the portals from monitoring purposes, but will be removed during final reclamation. Also during final reclamation, additional seals will be installed to conform with the near vertical slope at the outcrop.~~

MINING METHODS

Continuous Mining Units

The principle purpose for continuous mining units in Cottonwood Mine is development; i.e., driving main entries, opening headgates, tailgates, bleeder and setup entries for the longwall panels.

Figure 2 illustrates the basic configuration of the main entries. A six-entry system is planned for the main headings with

Revised 7/20/92

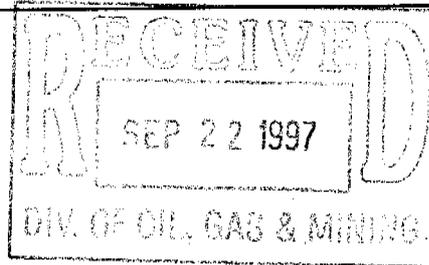
Revised 8/13/97

3-7



September 10, 1997

Utah Coal Regulatory Program
Division of Oil, Gas and Mining
451 East 400 North
Box 156
Price, Utah 84510



Attn: Bill Malencik

Re: Amendment to Cottonwood/Wilberg Mine Permit for Final Reclamation of the Channel Canyon Portals of the Cottonwood Mine, PacifiCorp, Cottonwood/Wilberg Mine, ACT/015/019, Emery County Utah

PacifiCorp, by and through its wholly-owned subsidiary, Energy West Mining Company ("Energy West") as mine operator, hereby submits an amendment regarding the above subject matter.

According to Volume 2, Part 4, of the Cottonwood/Wilberg Coal Mining Permit, two sets of seals were to be constructed at the Channel Canyon Portals. The first set were constructed in December 1990 approximately 25 feet from the outcrop. The seals were inspected and approved on May 13, 1997 (see attached approval letter). An additional set of seals were to be constructed at the outcrop to conform with the near vertical slope.

On August 1, 1997, the reclamation of the outcrop seals at the Channel Canyon portals was completed. The reclamation work took two days and included building additional seals at the outcrop, brushing black tar over the front of the seal to blend in with the natural environment, removing walkway and escape structures, and removing any refuse leftover from the reclamation processes. All materials were flown in and out by helicopter due to the remoteness of the portals. A photo essay is included to show how the work progressed and the final outcome of the reclamation procedures. Revisions to the Permit are as follows:

Pages:

1. page 3-6, Volume 2 (highlighted)
2. page 3-7, Volume 2 (highlighted)
3. page 4-1, Volume 2 (highlighted)
4. page 4-1.1, Volume 2 (highlighted)

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

Utah Coal Regulatory Program
September 10, 1997
Page Two

Drawings:

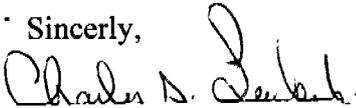
1. Drawing CM-10807-WB, Plate 3-1 of the Life of Mine Plan in Five Year Increments

Unless an unforeseen item has been neglected, all parameters necessary to this amendment have been covered and are complete.

In addition to this amendment, an application for reclamation release of the affected portal area will be filed with the Division. Phase I and Phase II reclamation is not applicable in the case of the Channel Canyon breakouts since the affected area occurs on a solid sandstone escarpment. Phase III of the reclamation was completed as described above for final reclamation.

Jesse Kelley from the Division has been contacted to inspect and make comments on the reclamation work. If you have any questions or concerns regarding the work performed in Channel Canyon, please feel free to contact me at 687-4720.

Sincerely,



Charles A. Semborski
Geology/Environmental Supervisor

enclosures

cc Carl Pollastro
John Christensen
Chuck Semborski
Blake Webster, Interwest Mining
Scott Child, Interwest Mining
Barbra Adams (File)

U. S. Department of Labor

Mine Safety and Health Administration
P.O. Box 25367
Denver, Colorado 80225-0367



Coal Mine Safety and Health
District 9

JUL 10 1997

Kent Norton
Manager, Health, Safety and Training
Energy West Mining Company
P. O. Box 310, 15 N. Main
Huntington, UT 84528

RE: Trail Mountain Mine
ID No. 42-01211
Channel Canyon Breakouts

Dear Mr. Norton:

The letter dated January 14, 1997, consisting of a cover letter, a detailed drawing of Channel Canyon breakouts, and a location map, requested MSHA to examine the seals at the two drift openings for compliance with federal regulations.

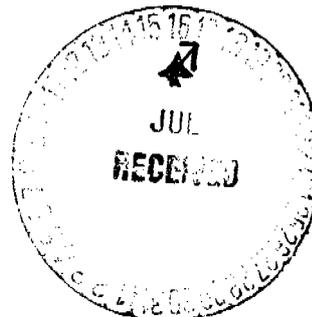
On Tuesday, May 13, 1997, James A. Martin, Coal Mine Inspector, traveled to the site and found that the seals in these two entries do satisfy the regulations in 30 CFR 75.1711.

If you have any questions, please contact this office at 303/231-5462.

Sincerely,

Wickie J. Vigil
for John A. Kuzar
District Manager

Enclosure



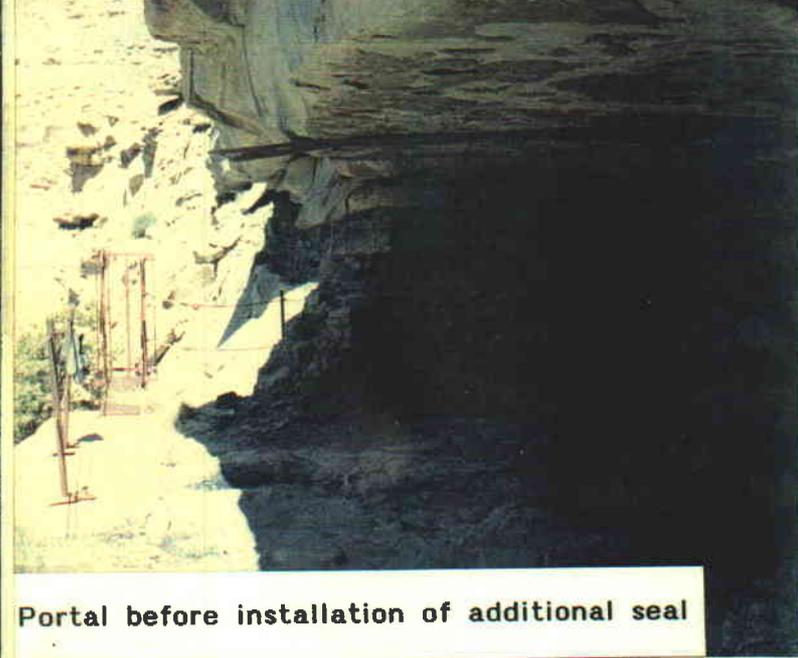


Channel Canyon Portals Reclamation Project

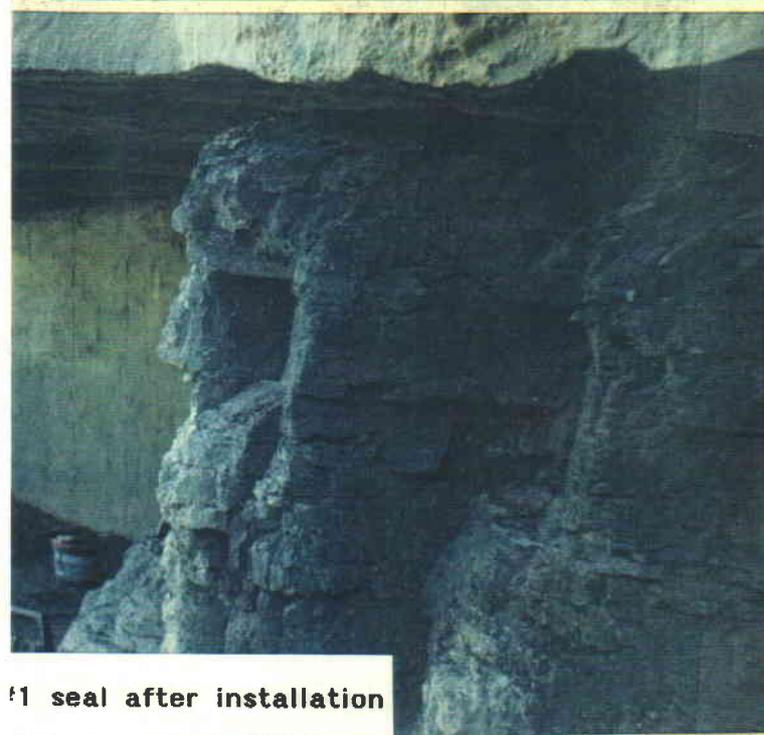
Completed 8/1/97



Before reclamation



Portal before installation of additional seal



#1 seal after installation



#2 seal after installation



Seal after tar application



After reclamation

RECLAMATION PLAN

Structure Removal

Once mining has ceased, estimated 2022, the surface facilities will be dismantled and removed from the permit area.

Starting at the mine portals, all belt lines, crushing and screening systems, electrical systems, truck laded surface building and fan installations will be torn down and hauled from the permit area.

The concrete silo will be torn down, broken up and buried against the east highway cut in the lower parking lot. All other concrete foundations that would be above final grade will be removed and buried with the silo material.

Portal Sealing

Final stages of mining (second mining), as pillars are extracted near the portal entrances inside, office and warehouse facilities will be dismantled and portal sealing will begin. Wilberg's portal entries are all updip of the extracted seam and require no drains or special hydrological containment seals, ~~except the Cottonwood fan portal drainage~~ (see Protection of the Hydrological Balance section). Seals are proposed as shown on Figure 1.

Because of their remote and inaccessible location from the surface, the following portals and breakouts will have to be completed from inside the mine: Channel Canyon, 7th West "Miller Canyon", Cottonwood mine belt portal. ~~The Channel Canyon escape ladder will remain to allow mine personnel access to portals for monitoring purposes but will be removed during final reclamation. Also during final reclamation, portals were sealed approximately 25 feet in by the outcrop and the additional seals for final reclamation was completed August 1, 1997. The Cottonwood Mine belt portal will be sealed sometime in the future. Final reclamation involved installing~~

Revised 7/20/92

Revised 8/13/97

additional seals ~~will be installed~~ to conform with the near vertical slope at the outcrop.

Revised 7/20/92

Revised 8/13/97

4-1.1

area is considered. Subsequent mining in a lower seam is not considered since the area has already been affected.

CHANNEL CANYON INTAKES

A two-entry intake breakout from the Hiawatha Seam was completed November 3, 1989, to provide additional ventilation for the Cottonwood Mine.

This breakout is located in the NW 1/4 of Section 32, T17S, R7E, SLBM, and was accomplished by developing a three entry system west of the 4th South Mains on 100 foot by 100 foot centers for 700 feet and then driving two entries in a southerly direction for approximately 200 feet, then breaking out into "Channel" Canyon. See mine plan Drawing CM-10807-WB. All work was performed from within the mine, minimizing downcasting of coal, rock, or waste materials down the canyon walls.

Each portal size is approximately 8 feet high by 20 feet wide and ~~upon completion they were fenced with chain link to prevent entry and warning signs were posted.~~ was permanently sealed approximately 25 feet in by the outcrop in December, 1991. The permanent seals are discussed later in this section. Final reclamation took place August 1, 1997 where additional seals were placed at the coal outcrop and coated with a black tar to blend in with the existing coal outcrop.

These breakouts ~~will be~~ were used primarily as ventilation entries and ~~will~~ did not have a portal pad.

As required by MSHA, these portals ~~will be~~ were designated as an emergency escapeway and, ~~therefore, they will~~ were require to provide an access from the portal level into the canyon. If, in the case of an emergency which would cut off all other routes of escape and these portals were used, the personnel could make their way to the canyon floor via a cable hand rail and ladder mounted on the rock ledge below the coal seam. ~~Since final reclamation has been completed on the Channel Canyon breakouts, there is no longer an escape route from these portals. The cable hand rail and ladder were removed.~~

The Hiawatha coal seam, at ~~this proposed~~ the breakout, dips downward towards the northwest at a 2% slope. Due to the southern orientation of the breakout entries, any mine water

Revised 5/1/90
Revised 8/13/97

produced near the breakouts would ~~then have~~ flowed down-dip into the mine rather than flowing out of the portals.

There ~~will were~~ not be any surface impacts other than the 8 feet by 20 feet breakouts themselves, and the escape ladder.

~~The breakout portals will be sealed upon abandonment of the 4th South Main entries scheduled in 1992.~~

Permanent portals seals, consisting of double wide concrete block walls ~~will be were~~ placed approximately 25 feet from the outcrop. All work ~~will be was~~ performed from within the mine and nothing in the way of coal, rock or waste materials ~~will be were~~ placed down the canyon. ~~The escape ladder and cable handrail are scheduled to remain to allow mine personnel access to the portals from monitoring purposes, but will be removed during final reclamation. Also during final reclamation, additional seals will be installed to conform with the near vertical slope at the outcrop.~~

MINING METHODS

Continuous Mining Units

The principle purpose for continuous mining units in Cottonwood Mine is development; i.e., driving main entries, opening headgates, tailgates, bleeder and setup entries for the longwall panels.

Figure 2 illustrates the basic configuration of the main entries. A six-entry system is planned for the main headings with

Revised 7/20/92

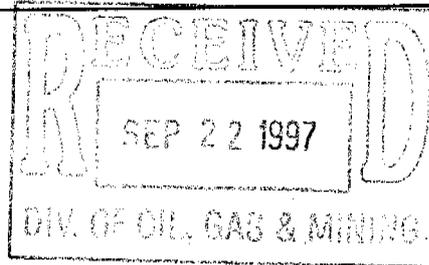
Revised 8/13/97

3-7



September 10, 1997

Utah Coal Regulatory Program
Division of Oil, Gas and Mining
451 East 400 North
Box 156
Price, Utah 84510



Attn: Bill Malencik

Re: Amendment to Cottonwood/Wilberg Mine Permit for Final Reclamation of the Channel Canyon Portals of the Cottonwood Mine, PacifiCorp, Cottonwood/Wilberg Mine, ACT/015/019, Emery County Utah

PacifiCorp, by and through its wholly-owned subsidiary, Energy West Mining Company ("Energy West") as mine operator, hereby submits an amendment regarding the above subject matter.

According to Volume 2, Part 4, of the Cottonwood/Wilberg Coal Mining Permit, two sets of seals were to be constructed at the Channel Canyon Portals. The first set were constructed in December 1990 approximately 25 feet from the outcrop. The seals were inspected and approved on May 13, 1997 (see attached approval letter). An additional set of seals were to be constructed at the outcrop to conform with the near vertical slope.

On August 1, 1997, the reclamation of the outcrop seals at the Channel Canyon portals was completed. The reclamation work took two days and included building additional seals at the outcrop, brushing black tar over the front of the seal to blend in with the natural environment, removing walkway and escape structures, and removing any refuse leftover from the reclamation processes. All materials were flown in and out by helicopter due to the remoteness of the portals. A photo essay is included to show how the work progressed and the final outcome of the reclamation procedures. Revisions to the Permit are as follows:

Pages:

1. page 3-6, Volume 2 (highlighted)
2. page 3-7, Volume 2 (highlighted)
3. page 4-1, Volume 2 (highlighted)
4. page 4-1.1, Volume 2 (highlighted)

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

Utah Coal Regulatory Program
September 10, 1997
Page Two

Drawings:

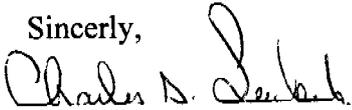
1. Drawing CM-10807-WB, Plate 3-1 of the Life of Mine Plan in Five Year Increments

Unless an unforeseen item has been neglected, all parameters necessary to this amendment have been covered and are complete.

In addition to this amendment, an application for reclamation release of the affected portal area will be filed with the Division. Phase I and Phase II reclamation is not applicable in the case of the Channel Canyon breakouts since the affected area occurs on a solid sandstone escarpment. Phase III of the reclamation was completed as described above for final reclamation.

Jesse Kelley from the Division has been contacted to inspect and make comments on the reclamation work. If you have any questions or concerns regarding the work performed in Channel Canyon, please feel free to contact me at 687-4720.

Sincerely,



Charles A. Semborski
Geology/Environmental Supervisor

enclosures

cc Carl Pollastro
John Christensen
Chuck Semborski
Blake Webster, Interwest Mining
Scott Child, Interwest Mining
Barbra Adams (File)

U. S. Department of Labor

Mine Safety and Health Administration
P.O. Box 25367
Denver, Colorado 80225-0367



Coal Mine Safety and Health
District 9

JUL 10 1997

Kent Norton
Manager, Health, Safety and Training
Energy West Mining Company
P. O. Box 310, 15 N. Main
Huntington, UT 84528

RE: Trail Mountain Mine
ID No. 42-01211
Channel Canyon Breakouts

Dear Mr. Norton:

The letter dated January 14, 1997, consisting of a cover letter, a detailed drawing of Channel Canyon breakouts, and a location map, requested MSHA to examine the seals at the two drift openings for compliance with federal regulations.

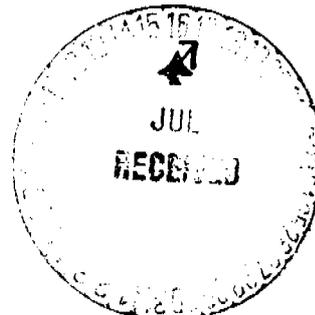
On Tuesday, May 13, 1997, James A. Martin, Coal Mine Inspector, traveled to the site and found that the seals in these two entries do satisfy the regulations in 30 CFR 75.1711.

If you have any questions, please contact this office at 303/231-5462.

Sincerely,

Wickie J. Vigil
for John A. Kuzar
District Manager

Enclosure





Channel Canyon Portals Reclamation Project

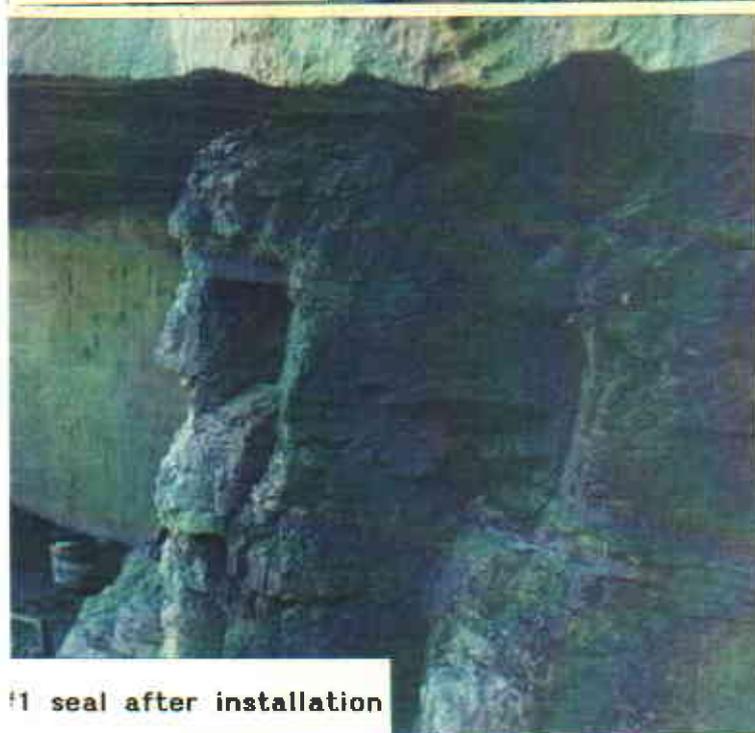
Completed 8/1/97



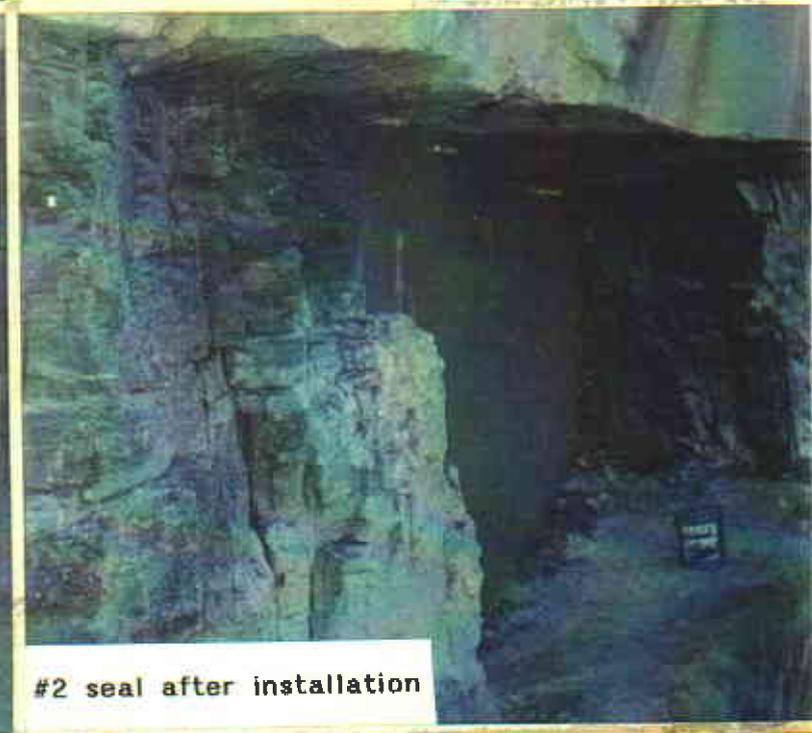
Before reclamation



Portal before installation of additional seal



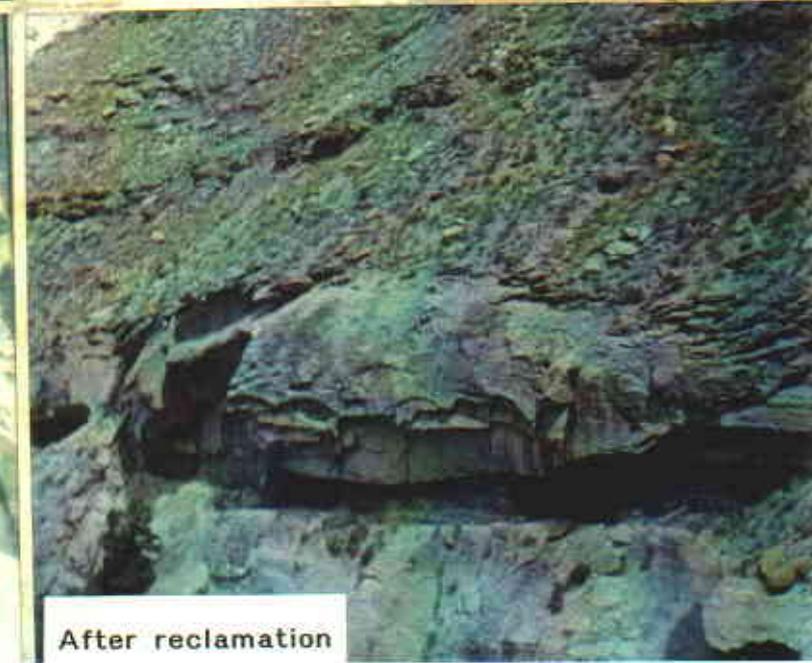
#1 seal after installation



#2 seal after installation



Seal after tar application



After reclamation

RECLAMATION PLAN

Structure Removal

Once mining has ceased, estimated 2022, the surface facilities will be dismantled and removed from the permit area.

Starting at the mine portals, all belt lines, crushing and screening systems, electrical systems, truck laded surface building and fan installations will be torn down and hauled from the permit area.

The concrete silo will be torn down, broken up and buried against the east highway cut in the lower parking lot. All other concrete foundations that would be above final grade will be removed and buried with the silo material.

Portal Sealing

Final stages of mining (second mining), as pillars are extracted near the portal entrances inside, office and warehouse facilities will be dismantled and portal sealing will begin. Wilberg's portal entries are all updip of the extracted seam and require no drains or special hydrological containment seals, ~~except the Cottonwood fan portal drainage~~ (see Protection of the Hydrological Balance section). Seals are proposed as shown on Figure 1.

Because of their remote and inaccessible location from the surface, the following portals and breakouts will have to be completed from inside the mine: Channel Canyon , 7th West "Miller Canyon", Cottonwood mine belt portal. ~~The Channel Canyon escape ladder will remain to allow mine personnel access to portals for monitoring purposes but will be removed during final reclamation. Also during final reclamation, portals were sealed approximately 25 feet in by the outcrop and the additional seals for final reclamation was completed August 1, 1997. The Cottonwood Mine belt portal will be sealed sometime in the future. Final reclamation involved installing~~

Revised 7/20/92

Revised 8/13/97

additional seals ~~will be installed~~ to conform with the near vertical slope at the outcrop.

Revised 7/20/92

Revised 8/13/97

4-1.1

area is considered. Subsequent mining in a lower seam is not considered since the area has already been affected.

CHANNEL CANYON INTAKES

A two-entry intake breakout from the Hiawatha Seam was completed November 3, 1989, to provide additional ventilation for the Cottonwood Mine.

This breakout is located in the NW 1/4 of Section 32, T17S, R7E, SLBM, and was accomplished by developing a three entry system west of the 4th South Mains on 100 foot by 100 foot centers for 700 feet and then driving two entries in a southerly direction for approximately 200 feet, then breaking out into "Channel" Canyon. See mine plan Drawing CM-10807-WB. All work was performed from within the mine, minimizing downcasting of coal, rock, or waste materials down the canyon walls.

Each portal size is approximately 8 feet high by 20 feet wide and ~~upon completion they were fenced with chain link to prevent entry and warning signs were posted.~~ was permanently sealed approximately 25 feet in by the outcrop in December, 1991. The permanent seals are discussed later in this section. Final reclamation took place August 1, 1997 where additional seals were placed at the coal outcrop and coated with a black tar to blend in with the existing coal outcrop.

These breakouts ~~will be~~ were used primarily as ventilation entries and ~~will did~~ not have a portal pad.

As required by MSHA, these portals ~~will be~~ were designated as an emergency escapeway and, ~~therefore, they will~~ were require to provide an access from the portal level into the canyon. If, in the case of an emergency which would cut off all other routes of escape and these portals were used, the personnel could make their way to the canyon floor via a cable hand rail and ladder mounted on the rock ledge below the coal seam. ~~Since final reclamation has been completed on the Channel Canyon breakouts, there is no longer an escape route from these portals. The cable hand rail and ladder were removed.~~

The Hiawatha coal seam, at ~~this proposed~~ the breakout, dips downward towards the northwest at a 2% slope. Due to the southern orientation of the breakout entries, any mine water

Revised 5/1/90
Revised 8/13/97

produced near the breakouts would ~~then have~~ flowed down-dip into the mine rather than flowing out of the portals.

There ~~will~~ ~~were~~ not be any surface impacts other than the 8 feet by 20 feet breakouts themselves, and the escape ladder.

~~The breakout portals will be sealed upon abandonment of the 4th South Main entries scheduled in 1992.~~

Permanent portals seals, consisting of double wide concrete block walls ~~will be~~ ~~were~~ placed approximately 25 feet from the outcrop. All work ~~will be~~ ~~was~~ performed from within the mine and nothing in the way of coal, rock or waste materials ~~will be~~ ~~were~~ placed down the canyon. ~~The escape ladder and cable handrail are scheduled to remain to allow mine personnel access to the portals from monitoring purposes, but will be removed during final reclamation. Also during final reclamation, additional seals will be installed to conform with the near vertical slope at the outcrop.~~

MINING METHODS

Continuous Mining Units

The principle purpose for continuous mining units in Cottonwood Mine is development; i.e., driving main entries, opening headgates, tailgates, bleeder and setup entries for the longwall panels.

Figure 2 illustrates the basic configuration of the main entries. A six-entry system is planned for the main headings with

Revised 7/20/92

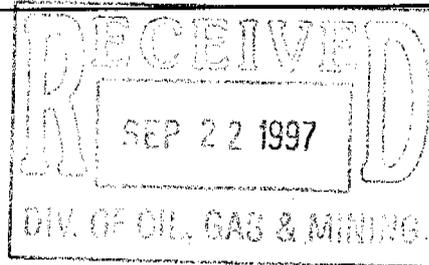
Revised 8/13/97

3-7



September 10, 1997

Utah Coal Regulatory Program
Division of Oil, Gas and Mining
451 East 400 North
Box 156
Price, Utah 84510



Attn: Bill Malencik

Re: Amendment to Cottonwood/Wilberg Mine Permit for Final Reclamation of the Channel Canyon Portals of the Cottonwood Mine, PacifiCorp, Cottonwood/Wilberg Mine, ACT/015/019, Emery County Utah

PacifiCorp, by and through its wholly-owned subsidiary, Energy West Mining Company ("Energy West") as mine operator, hereby submits an amendment regarding the above subject matter.

According to Volume 2, Part 4, of the Cottonwood/Wilberg Coal Mining Permit, two sets of seals were to be constructed at the Channel Canyon Portals. The first set were constructed in December 1990 approximately 25 feet from the outcrop. The seals were inspected and approved on May 13, 1997 (see attached approval letter). An additional set of seals were to be constructed at the outcrop to conform with the near vertical slope.

On August 1, 1997, the reclamation of the outcrop seals at the Channel Canyon portals was completed. The reclamation work took two days and included building additional seals at the outcrop, brushing black tar over the front of the seal to blend in with the natural environment, removing walkway and escape structures, and removing any refuse leftover from the reclamation processes. All materials were flown in and out by helicopter due to the remoteness of the portals. A photo essay is included to show how the work progressed and the final outcome of the reclamation procedures. Revisions to the Permit are as follows:

Pages:

1. page 3-6, Volume 2 (highlighted)
2. page 3-7, Volume 2 (highlighted)
3. page 4-1, Volume 2 (highlighted)
4. page 4-1.1, Volume 2 (highlighted)

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

Utah Coal Regulatory Program
September 10, 1997
Page Two

Drawings:

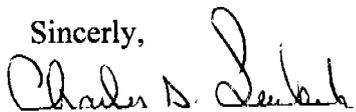
1. Drawing CM-10807-WB, Plate 3-1 of the Life of Mine Plan in Five Year Increments

Unless an unforeseen item has been neglected, all parameters necessary to this amendment have been covered and are complete.

In addition to this amendment, an application for reclamation release of the affected portal area will be filed with the Division. Phase I and Phase II reclamation is not applicable in the case of the Channel Canyon breakouts since the affected area occurs on a solid sandstone escarpment. Phase III of the reclamation was completed as described above for final reclamation.

Jesse Kelley from the Division has been contacted to inspect and make comments on the reclamation work. If you have any questions or concerns regarding the work performed in Channel Canyon, please feel free to contact me at 687-4720.

Sincerely,



Charles A. Semborski
Geology/Environmental Supervisor

enclosures

cc Carl Pollastro
John Christensen
Chuck Semborski
Blake Webster, Interwest Mining
Scott Child, Interwest Mining
Barbra Adams (File)

U. S. Department of Labor

Mine Safety and Health Administration
P.O. Box 25367
Denver, Colorado 80225-0367



Coal Mine Safety and Health
District 9

JUL 10 1997

Kent Norton
Manager, Health, Safety and Training
Energy West Mining Company
P. O. Box 310, 15 N. Main
Huntington, UT 84528

RE: Trail Mountain Mine
ID No. 42-01211
Channel Canyon Breakouts

Dear Mr. Norton:

The letter dated January 14, 1997, consisting of a cover letter, a detailed drawing of Channel Canyon breakouts, and a location map, requested MSHA to examine the seals at the two drift openings for compliance with federal regulations.

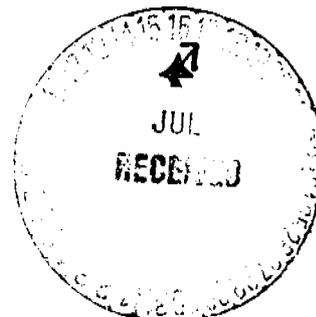
On Tuesday, May 13, 1997, James A. Martin, Coal Mine Inspector, traveled to the site and found that the seals in these two entries do satisfy the regulations in 30 CFR 75.1711.

If you have any questions, please contact this office at 303/231-5462.

Sincerely,

Wickie J. Vigil
for John A. Kuzar
District Manager

Enclosure



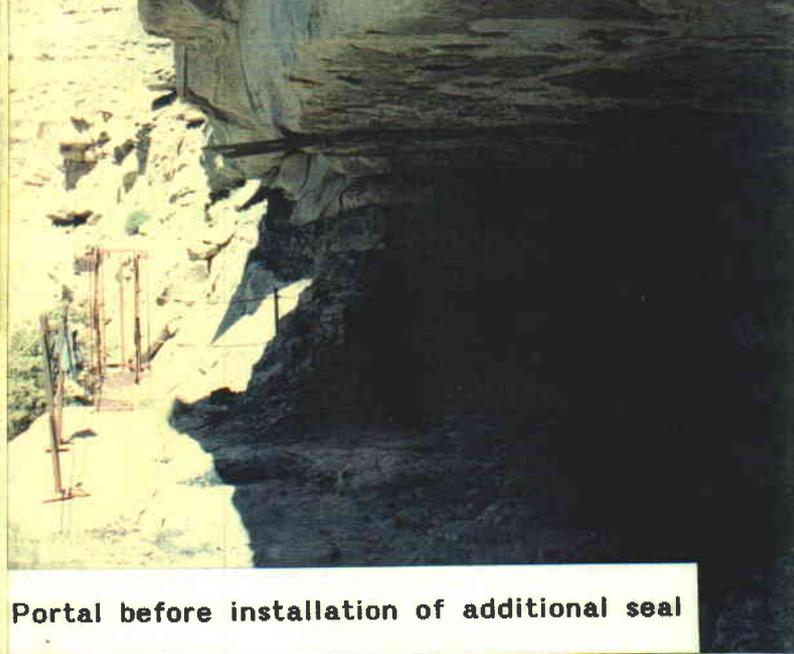


Channel Canyon Portals Reclamation Project

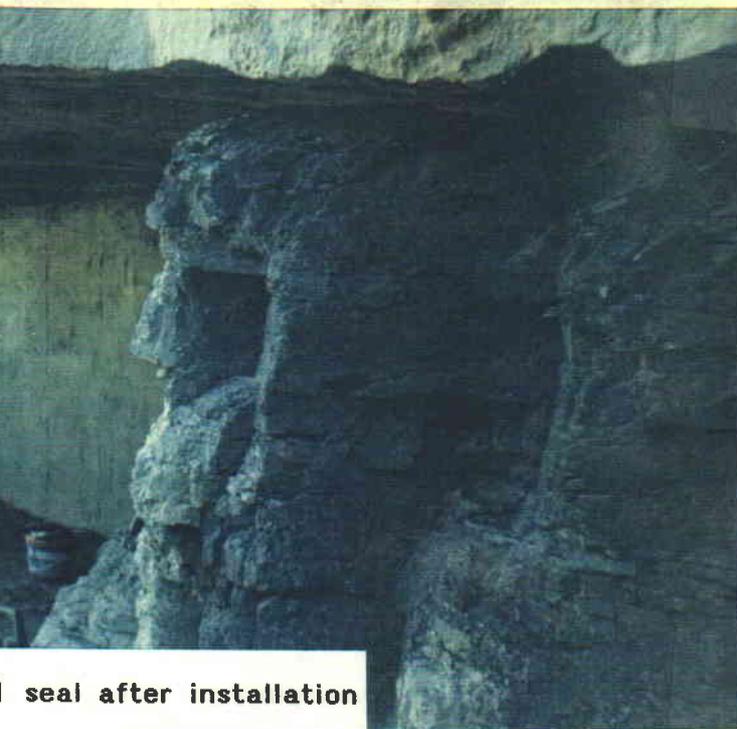
Completed 8/1/97



Before reclamation



Portal before installation of additional seal



seal after installation



#2 seal after installation



seal after tar application



After reclamation

RECLAMATION PLAN

Structure Removal

Once mining has ceased, estimated 2022, the surface facilities will be dismantled and removed from the permit area.

Starting at the mine portals, all belt lines, crushing and screening systems, electrical systems, truck laded surface building and fan installations will be torn down and hauled from the permit area.

The concrete silo will be torn down, broken up and buried against the east highway cut in the lower parking lot. All other concrete foundations that would be above final grade will be removed and buried with the silo material.

Portal Sealing

Final stages of mining (second mining), as pillars are extracted near the portal entrances inside, office and warehouse facilities will be dismantled and portal sealing will begin. Wilberg's portal entries are all updip of the extracted seam and require no drains or special hydrological containment seals, ~~except the Cottonwood fan portal drainage~~ (see Protection of the Hydrological Balance section). Seals are proposed as shown on Figure 1.

Because of their remote and inaccessible location from the surface, the following portals and breakouts will have to be completed from inside the mine: Channel Canyon, 7th West "Miller Canyon", Cottonwood mine belt portal. ~~The Channel Canyon escape ladder will remain to allow mine personnel access to portals for monitoring purposes but will be removed during final reclamation. Also during final reclamation, portals were sealed approximately 25 feet in by the outcrop and the additional seals for final reclamation was completed August 1, 1997. The Cottonwood Mine belt portal will be sealed sometime in the future. Final reclamation involved installing~~

Revised 7/20/92

Revised 8/13/97

additional seals ~~will be installed~~ to conform with the near vertical slope at the outcrop.

Revised 7/20/92

Revised 8/13/97

4-1.1

area is considered. Subsequent mining in a lower seam is not considered since the area has already been affected.

CHANNEL CANYON INTAKES

A two-entry intake breakout from the Hiawatha Seam was completed November 3, 1989, to provide additional ventilation for the Cottonwood Mine.

This breakout is located in the NW 1/4 of Section 32, T17S, R7E, SLBM, and was accomplished by developing a three entry system west of the 4th South Mains on 100 foot by 100 foot centers for 700 feet and then driving two entries in a southerly direction for approximately 200 feet, then breaking out into "Channel" Canyon. See mine plan Drawing CM-10807-WB. All work was performed from within the mine, minimizing downcasting of coal, rock, or waste materials down the canyon walls.

Each portal size is approximately 8 feet high by 20 feet wide and ~~upon completion they were fenced with chain link to prevent entry and warning signs were posted.~~ was permanently sealed approximately 25 feet in by the outcrop in December, 1991. The permanent seals are discussed later in this section. Final reclamation took place August 1, 1997 where additional seals were placed at the coal outcrop and coated with a black tar to blend in with the existing coal outcrop.

These breakouts ~~will be~~ were used primarily as ventilation entries and ~~will~~ did not have a portal pad.

As required by MSHA, these portals ~~will be~~ were designated as an emergency escapeway and, ~~therefore, they will~~ were require to provide an access from the portal level into the canyon. If, in the case of an emergency which would cut off all other routes of escape and these portals were used, the personnel could make their way to the canyon floor via a cable hand rail and ladder mounted on the rock ledge below the coal seam. ~~Since final reclamation has been completed on the Channel Canyon breakouts, there is no longer an escape route from these portals. The cable hand rail and ladder were removed.~~

The Hiawatha coal seam, at ~~this proposed~~ the breakout, dips downward towards the northwest at a 2% slope. Due to the southern orientation of the breakout entries, any mine water

Revised 5/1/90
Revised 8/13/97

produced near the breakouts would then have flowed down-dip into the mine rather than flowing out of the portals.

There will were not be any surface impacts other than the 8 feet by 20 feet breakouts themselves, and the escape ladder.

~~The breakout portals will be sealed upon abandonment of the 4th South Main entries scheduled in 1992.~~

Permanent portals seals, consisting of double wide concrete block walls will be were placed approximately 25 feet from the outcrop. All work will be was performed from within the mine and nothing in the way of coal, rock or waste materials will be were placed down the canyon. The escape ladder and cable handrail are scheduled to remain to allow mine personnel access to the portals from monitoring purposes, but will be removed during final reclamation. Also during final reclamation, additional seals will be installed to conform with the near vertical slope at the outcrop.

MINING METHODS

Continuous Mining Units

The principle purpose for continuous mining units in Cottonwood Mine is development; i.e., driving main entries, opening headgates, tailgates, bleeder and setup entries for the longwall panels.

Figure 2 illustrates the basic configuration of the main entries. A six-entry system is planned for the main headings with

Revised 7/20/92

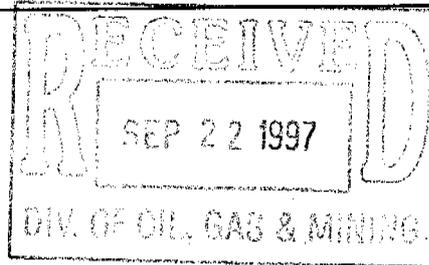
Revised 8/13/97

3-7



September 10, 1997

Utah Coal Regulatory Program
Division of Oil, Gas and Mining
451 East 400 North
Box 156
Price, Utah 84510



Attn: Bill Malencik

Re: Amendment to Cottonwood/Wilberg Mine Permit for Final Reclamation of the Channel Canyon Portals of the Cottonwood Mine, PacifiCorp, Cottonwood/Wilberg Mine, ACT/015/019, Emery County Utah

PacifiCorp, by and through its wholly-owned subsidiary, Energy West Mining Company ("Energy West") as mine operator, hereby submits an amendment regarding the above subject matter.

According to Volume 2, Part 4, of the Cottonwood/Wilberg Coal Mining Permit, two sets of seals were to be constructed at the Channel Canyon Portals. The first set were constructed in December 1990 approximately 25 feet from the outcrop. The seals were inspected and approved on May 13, 1997 (see attached approval letter). An additional set of seals were to be constructed at the outcrop to conform with the near vertical slope.

On August 1, 1997, the reclamation of the outcrop seals at the Channel Canyon portals was completed. The reclamation work took two days and included building additional seals at the outcrop, brushing black tar over the front of the seal to blend in with the natural environment, removing walkway and escape structures, and removing any refuse leftover from the reclamation processes. All materials were flown in and out by helicopter due to the remoteness of the portals. A photo essay is included to show how the work progressed and the final outcome of the reclamation procedures. Revisions to the Permit are as follows:

Pages:

1. page 3-6, Volume 2 (highlighted)
2. page 3-7, Volume 2 (highlighted)
3. page 4-1, Volume 2 (highlighted)
4. page 4-1.1, Volume 2 (highlighted)

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

Utah Coal Regulatory Program
September 10, 1997
Page Two

Drawings:

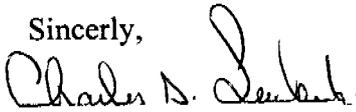
1. Drawing CM-10807-WB, Plate 3-1 of the Life of Mine Plan in Five Year Increments

Unless an unforeseen item has been neglected, all parameters necessary to this amendment have been covered and are complete.

In addition to this amendment, an application for reclamation release of the affected portal area will be filed with the Division. Phase I and Phase II reclamation is not applicable in the case of the Channel Canyon breakouts since the affected area occurs on a solid sandstone escarpment. Phase III of the reclamation was completed as described above for final reclamation.

Jesse Kelley from the Division has been contacted to inspect and make comments on the reclamation work. If you have any questions or concerns regarding the work performed in Channel Canyon, please feel free to contact me at 687-4720.

Sincerely,



Charles A. Semborski
Geology/Environmental Supervisor

enclosures

cc Carl Pollastro
John Christensen
Chuck Semborski
Blake Webster, Interwest Mining
Scott Child, Interwest Mining
Barbra Adams (File)

U. S. Department of Labor

Mine Safety and Health Administration
P.O. Box 25367
Denver, Colorado 80225-0367



**Coal Mine Safety and Health
District 9**

JUL 10 1997

Kent Norton
Manager, Health, Safety and Training
Energy West Mining Company
P. O. Box 310, 15 N. Main
Huntington, UT 84528

RE: Trail Mountain Mine
ID No. 42-01211
Channel Canyon Breakouts

Dear Mr. Norton:

The letter dated January 14, 1997, consisting of a cover letter, a detailed drawing of Channel Canyon breakouts, and a location map, requested MSHA to examine the seals at the two drift openings for compliance with federal regulations.

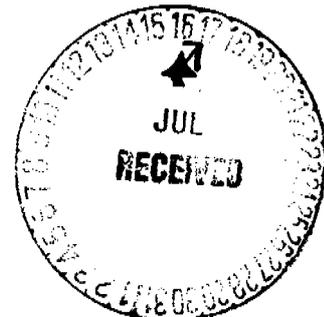
On Tuesday, May 13, 1997, James A. Martin, Coal Mine Inspector, traveled to the site and found that the seals in these two entries do satisfy the regulations in 30 CFR 75.1711.

If you have any questions, please contact this office at 303/231-5462.

Sincerely,

John A. Kuzar
for John A. Kuzar
District Manager

Enclosure



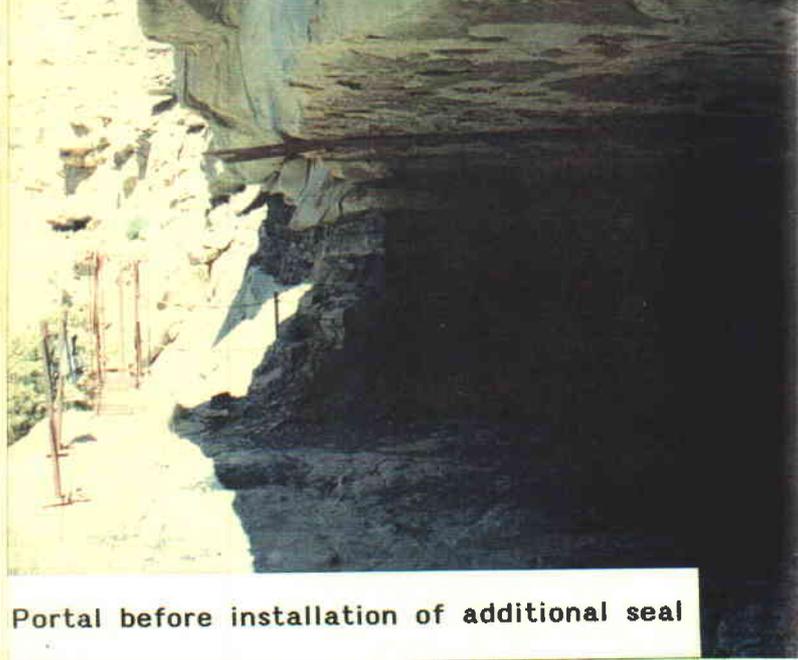


Channel Canyon Portals Reclamation Project

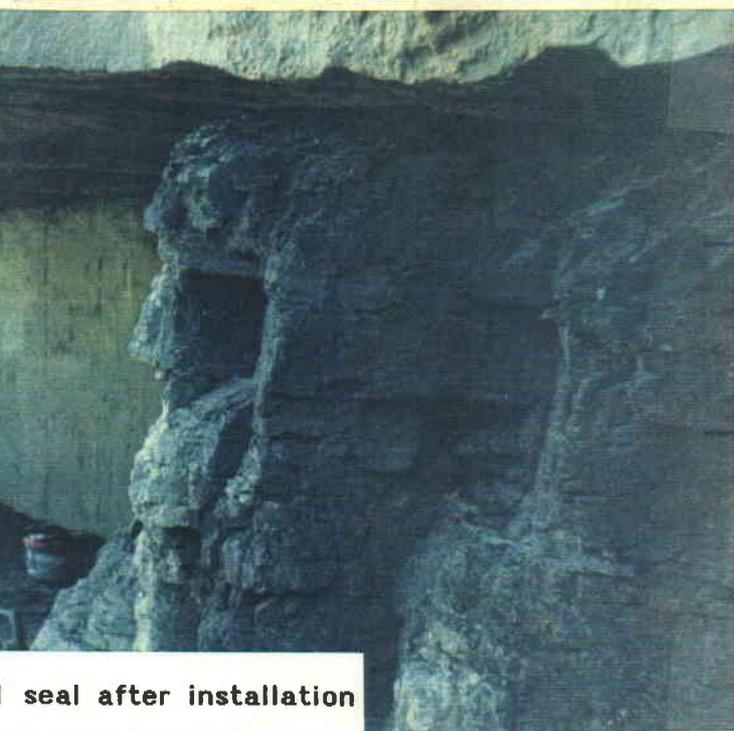
Completed 8/1/97



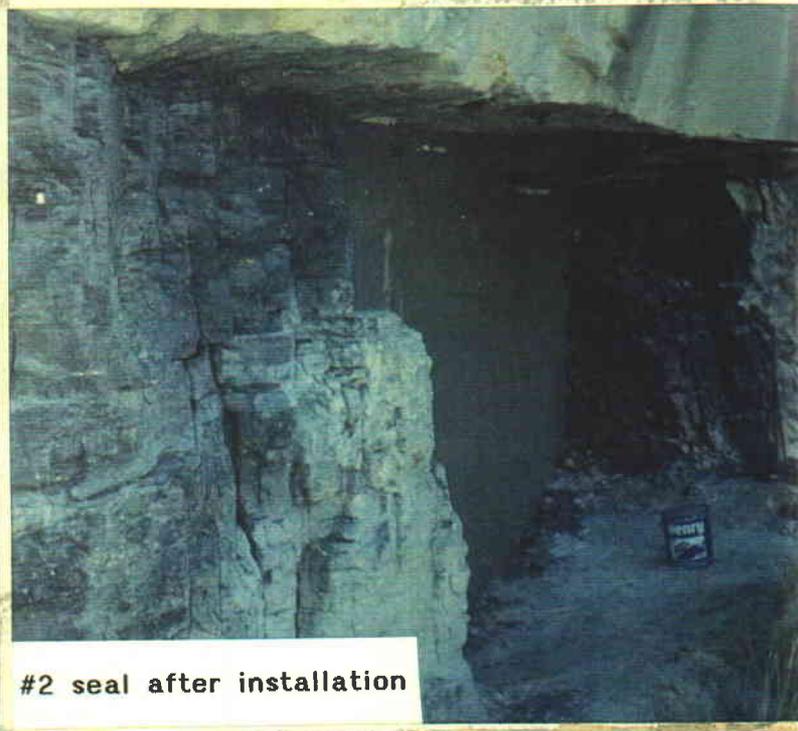
Before reclamation



Portal before installation of additional seal



seal after installation



#2 seal after installation



seal after tar application



After reclamation

RECLAMATION PLAN

Structure Removal

Once mining has ceased, estimated 2022, the surface facilities will be dismantled and removed from the permit area.

Starting at the mine portals, all belt lines, crushing and screening systems, electrical systems, truck laded surface building and fan installations will be torn down and hauled from the permit area.

The concrete silo will be torn down, broken up and buried against the east highway cut in the lower parking lot. All other concrete foundations that would be above final grade will be removed and buried with the silo material.

Portal Sealing

Final stages of mining (second mining), as pillars are extracted near the portal entrances inside, office and warehouse facilities will be dismantled and portal sealing will begin. Wilberg's portal entries are all updip of the extracted seam and require no drains or special hydrological containment seals, ~~except the Cottonwood fan portal drainage~~ (see Protection of the Hydrological Balance section). Seals are proposed as shown on Figure 1.

Because of their remote and inaccessible location from the surface, the following portals and breakouts will have to be completed from inside the mine: Channel Canyon, 7th West "Miller Canyon", Cottonwood mine belt portal. ~~The Channel Canyon escape ladder will remain to allow mine personnel access to portals for monitoring purposes but will be removed during final reclamation. Also during final reclamation, portals were sealed approximately 25 feet in by the outcrop and the additional seals for final reclamation was completed August 1, 1997. The Cottonwood Mine belt portal will be sealed sometime in the future. Final reclamation involved installing~~

Revised 7/20/92

Revised 8/13/97

additional seals ~~will be installed~~ to conform with the near vertical slope at the outcrop.

Revised 7/20/92

Revised 8/13/97

4-1.1

area is considered. Subsequent mining in a lower seam is not considered since the area has already been affected.

CHANNEL CANYON INTAKES

A two-entry intake breakout from the Hiawatha Seam was completed November 3, 1989, to provide additional ventilation for the Cottonwood Mine.

This breakout is located in the NW 1/4 of Section 32, T17S, R7E, SLBM, and was accomplished by developing a three entry system west of the 4th South Mains on 100 foot by 100 foot centers for 700 feet and then driving two entries in a southerly direction for approximately 200 feet, then breaking out into "Channel" Canyon. See mine plan Drawing CM-10807-WB. All work was performed from within the mine, minimizing downcasting of coal, rock, or waste materials down the canyon walls.

Each portal size is approximately 8 feet high by 20 feet wide and ~~upon completion they were fenced with chain link to prevent entry and warning signs were posted.~~ was permanently sealed approximately 25 feet in by the outcrop in December, 1991. The permanent seals are discussed later in this section. Final reclamation took place August 1, 1997 where additional seals were placed at the coal outcrop and coated with a black tar to blend in with the existing coal outcrop.

These breakouts ~~will be~~ were used primarily as ventilation entries and ~~will~~ did not have a portal pad.

As required by MSHA, these portals ~~will be~~ were designated as an emergency escapeway and, ~~therefore, they will~~ were require to provide an access from the portal level into the canyon. If, in the case of an emergency which would cut off all other routes of escape and these portals were used, the personnel could make their way to the canyon floor via a cable hand rail and ladder mounted on the rock ledge below the coal seam. ~~Since final reclamation has been completed on the Channel Canyon breakouts, there is no longer an escape route from these portals. The cable hand rail and ladder were removed.~~

The Hiawatha coal seam, at ~~this proposed~~ the breakout, dips downward towards the northwest at a 2% slope. Due to the southern orientation of the breakout entries, any mine water

Revised 5/1/90
Revised 8/13/97

produced near the breakouts would ~~then have~~ flowed down-dip into the mine rather than flowing out of the portals.

There ~~will were~~ not be any surface impacts other than the 8 feet by 20 feet breakouts themselves, and the escape ladder.

~~The breakout portals will be sealed upon abandonment of the 4th South Main entries scheduled in 1992.~~

Permanent portals seals, consisting of double wide concrete block walls ~~will be were~~ placed approximately 25 feet from the outcrop. All work ~~will be was~~ performed from within the mine and nothing in the way of coal, rock or waste materials ~~will be were~~ placed down the canyon. ~~The escape ladder and cable handrail are scheduled to remain to allow mine personnel access to the portals from monitoring purposes, but will be removed during final reclamation. Also during final reclamation, additional seals will be installed to conform with the near vertical slope at the outcrop.~~

MINING METHODS

Continuous Mining Units

The principle purpose for continuous mining units in Cottonwood Mine is development; i.e., driving main entries, opening headgates, tailgates, bleeder and setup entries for the longwall panels.

Figure 2 illustrates the basic configuration of the main entries. A six-entry system is planned for the main headings with

Revised 7/20/92

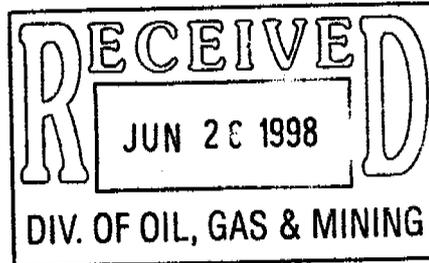
Revised 8/13/97

3-7



June 24, 1998

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



Attn: Pam Grubaugh-Littig

Re: Clean Copies of the Phase III Bond Release, Channel Canyon Portal Breakouts, PacifiCorp, Cottonwood/Wilberg, ACT/015/019-BR97G, Folder #3, Emery County, Utah.

Attached is seven copies of the "clean" version of the above mentioned amendment. Please place the approved Division of Oil Gas and Mining stamp on these pages and map for distribution and insertion into our Cottonwood/Wilberg MRP.

If you have any questions or concerns involving this amendment, please feel free to contact Dennis Oakley at 687-4825 or myself at 687-4720.

Sincerely,

Chuck Semborski
Permitting/Geology Supervisor

cc: Carl Pollastro
Dennis Oakley
Blake Webster

J:\PCCOMMON\PCCOMMON\ENVIRONM\PERMITS\CTWMINE\AMENDMNT\1998\CHNLCLN.COR

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

area is considered. Subsequent mining in a lower seam is not considered since the area has already been affected.

CHANNEL CANYON INTAKES

A two-entry intake breakout from the Hiawatha Seam was completed November 3, 1989, to provide additional ventilation for the Cottonwood Mine.

This breakout is located in the NW 1/4 of Section 32, T17S, R7E, SLBM, and was accomplished by developing a three entry system west of the 4th South Mains on 100 foot by 100 foot centers for 700 feet and then driving two entries in a southerly direction for approximately 200 feet, then breaking out into "Channel" Canyon. See mine plan Drawing CM-10807-WB. All work was performed from within the mine, minimizing downcasting of coal, rock, or waste materials down the canyon walls.

Each portal size is approximately 8 feet high by 20 feet wide and upon completion they were fenced with chain link to prevent entry and warning signs were posted. was permanently sealed approximately 25 feet in by the outcrop in December, 1991. The permanent seals are discussed later in this section. Final reclamation took place August 1, 1997 where additional seals were placed at the coal outcrop and coated with a black tar to blend in with the existing coal outcrop.

These breakouts will be were used primarily as ventilation entries and will did not have a portal pad.

As required by MSHA, these portals will be were designated as an emergency escapeway and, therefore, they will were require to provide an access from the portal level into the canyon. If, in the case of an emergency which would cut off all other routes of escape and these portals were used, the personnel could make their way to the canyon floor via a cable hand rail and ladder mounted on the rock ledge below the coal seam. Since final reclamation has been completed on the Channel Canyon breakouts, there is no longer an escape route from these portals. The cable hand rail and ladder were removed.

The Hiawatha coal seam, at this proposed the breakout, dips downward towards the northwest at a 2% slope. Due to the southern orientation of the breakout entries, any mine water

Revised 5/1/90
Revised 8/13/97

produced near the breakouts would then have flowed down-dip into the mine rather than flowing out of the portals.

There will be not be any surface impacts other than the 8 feet by 20 feet breakouts themselves, and the escape ladder.

The breakout portals will be sealed upon abandonment of the 4th South Main entries scheduled in 1992.

Permanent portals seals, consisting of double wide concrete block walls will be placed approximately 25 feet from the outcrop. All work will be performed from within the mine and nothing in the way of coal, rock or waste materials will be placed down the canyon. The escape ladder and cable handrail are scheduled to remain to allow mine personnel access to the portals from monitoring purposes, but will be removed during final reclamation. Also during final reclamation, additional seals will be installed to conform with the near vertical slope at the outcrop.

MINING METHODS

Continuous Mining Units

The principle purpose for continuous mining units in Cottonwood Mine is development; i.e., driving main entries, opening headgates, tailgates, bleeder and setup entries for the longwall panels.

Figure 2 illustrates the basic configuration of the main entries. A six-entry system is planned for the main headings with

Revised 7/20/92

Revised 8/13/97

3-7

RECLAMATION PLAN

Structure Removal

Once mining has ceased, estimated 2022, the surface facilities will be dismantled and removed from the permit area.

Starting at the mine portals, all belt lines, crushing and screening systems, electrical systems, truck laded surface building and fan installations will be torn down and hauled from the permit area.

The concrete silo will be torn down, broken up and buried against the east highway cut in the lower parking lot. All other concrete foundations that would be above final grade will be removed and buried with the silo material.

Portal Sealing

Final stages of mining (second mining), as pillars are extracted near the portal entrances inside, office and warehouse facilities will be dismantled and portal sealing will begin. Wilberg's portal entries are all updip of the extracted seam and require no drains or special hydrological containment seals. except the Cottonwood fan portal drainage (see Protection of the Hydrological Balance section). Seals are proposed as shown on Figure 1.

Because of their remote and inaccessible location from the surface, the following portals and breakouts will have to be completed from inside the mine: Channel Canyon , 7th West "Miller Canyon", Cottonwood mine belt portal. The Channel Canyon escape ladder will remain to allow mine personnel access to portals for monitoring purposes but will be removed during final reclamation. Also during final reclamation, portals were sealed approximately 25 feet in by the outcrop and the additional seals for final reclamation was completed August 1, 1997. The Cottonwood Mine belt portal will be sealed sometime in the future. Final reclamation involved installing

Revised 7/20/92

Revised 8/13/97

4-1

additional seals will be installed to conform with the near vertical slope at the outcrop.

Revised 7/20/92

Revised 8/13/97

4-1.1



State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

1594 West North Temple, Suite 1210
PO Box 145801
Salt Lake City, Utah 84114-5801
801-538-5340
801-359-3940 (Fax)
801-538-7223 (TDD)

Michael O. Leavitt
Governor
Lowell P. Braxton
Division Director

July 10, 1998

Chuck Semborski, Environmental Supervisor
Energy West Mining Company
P.O. Box 310
Huntington, Utah 84528

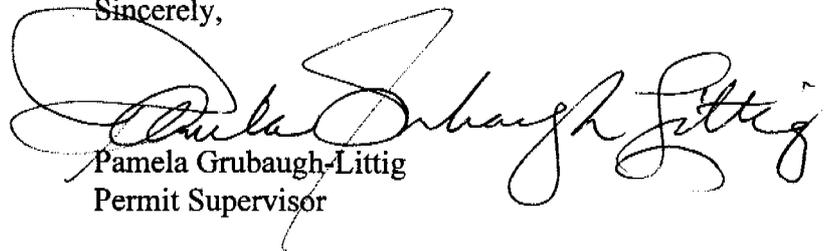
Re: Phase III Bond Release, Channel Canyon Portal Breakouts, PacifiCorp,
Cottonwood/Wilberg, ACT/015/019-BR97G, Folder #3, Emery County, Utah

Dear Mr. Semborski:

The Division approved Phase III bond release for the Channel Canyon breakouts on March 26, 1998. Enclosed is a stamped approved incorporated copy for insertion into your Mining and Reclamation Plan.

If you have any questions, please feel free to call.

Sincerely,



Pamela Grubaugh-Littig
Permit Supervisor

tam

cc: Ranvir Singh, OSM
Richard Manus, BLM
Janette Kaiser, USFS
Mark Page, Water Rights, w/o
Dave Ariotti, DEQ, w/o
Bill Bates, DWR, w/o
Price Field Office

O:\015019.CWW\FINAL\CLEANCOP.97G



State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

1594 West North Temple, Suite 1210
PO Box 145801
Salt Lake City, Utah 84114-5801
801-538-5340
801-359-3940 (Fax)
801-538-7223 (TDD)

Michael O. Leavitt
Governor
Lowell P. Braxton
Division Director

June 19, 1998

Chuck Semborski, Environmental Supervisor
Energy West Mining Company
P.O. Box 310
Huntington, Utah 84528

Re: Phase III Bond Release, Channel Canyon Portal Breakouts, PacifiCorp,
Cottonwood/Wilberg, ACT/015/019-BR97G, Folder #3, Emery County, Utah

Dear Mr. Semborski:

The Division approved Phase III bond release for the Channel Canyon breakouts on March 26, 1998. However, we need seven clean copies of the submittal for distribution and insertion into your Mining and Reclamation Plan.

If you have any questions, please feel free to call.

Sincerely,

A handwritten signature in cursive script, appearing to read "Pamela Grubaugh-Littig".

Pamela Grubaugh-Littig
Permit Supervisor

tam

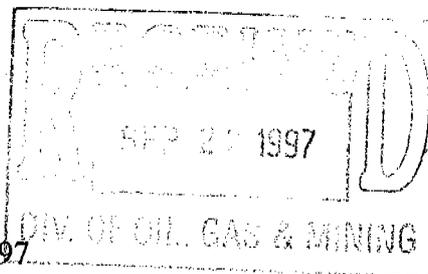
O:\015019.CWW\FINAL\CLEANCOP.97G



State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

Michael O. Leavitt
Governor
Ted Stewart
Executive Director
James W. Carter
Division Director

1594 West North Temple, Suite 1210
Box 145801
Salt Lake City, Utah 84114-5801
(801) 538-5340
(801) 359-3940 (Fax)



September 16, 1997

To: File

Thru: Joe Helfrich, Permit Supervisor, Compliance 

From: Wm. J. Malencik, Reclamation Specialist 

RE: Channel Canyon Portals Reclamation, PacifiCorp, Cottonwood Mine, ACT/015/019-97G, Folder #2, Emery County, Utah

The enclosed amendment filed by PacifiCorp requests final reclamation on the Channel Canyon Portals.

You will note that Jess Kelley has been contacted by the permittee concerning this amendment. You have heretofore received a copy of their transmittal letter.

Since this amendment concerns final reclamation, it would appear only reasonable that the required disciplines as determined by you should participate in the review. Further, the permittee in the next to last paragraph states that an "application for reclamation release" of the affected portal area will be filed with the Division.

It appears the permittee has analyzed and made the following conclusions on this matter:

- (1) Phase III bond release is a required prerequisite for federal lease relinquishment.
- (2) Without being specific, it appears the permittee is taking the position the area cannot be backfilled, topsoiled, nor seeded. He has done all the feasible reclamation work.
- (3) Phase I and II bond release requirements as required by the coal rules have been met to the extent feasible.
- (4) The portals have been sealed. The area has been secured from a safety standpoint and approved by MSHA.



Page 2
File/J. Helfrich
Channel Canyon Portals - 97G
September 16, 1997

- (5) If phase II requirements are not applicable because of site conditions, then phase III bond release is not subject to the statutory 10 year mandatory period.

Recommendation

Even though this particular amendment may appear unique; nevertheless, there are several such cases that have come in the past. Also, can expect others in the future. The Horse Canyon breakout and other breakouts I believe have been approved by the Division.

My recommendations are as follows:

- (1) Besides Jess Kelley, assign others as needed to this project. Please keep in mind the goal of PacifiCorp is lease relinquishment and phase III bond release.

I would be happy to join the Division staff on this project.

- (2) Have discussed tentative dates with Mr. Semborski. He suggests a one day field meeting. Details are as follows:
 - a) Review amendment before field meeting.
 - b) Meet either September 22 or 23, 1997 at 9:00 a.m.
 - c) Meet at the Trail Mountain Mine.
 - d) Bring lunch, water, climbing shoes, etc.

We have retained one copy of the amendment for our files.

sd
enclosures
cc: Chuck Semborski, PacifiCorp, Huntington, w/o enc



State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

Michael O. Leavitt
Governor
Ted Stewart
Executive Director
Lowell P. Braxton
Division Director

1594 West North Temple, Suite 1210
PO Box 145801
Salt Lake City, Utah 84114-5801
801-538-5340
801-359-3940 (Fax)
801-538-7223 (TDD)

bcc: Pam, w/o
Daron, w/o
Joe, w/o
Bill M, w/o

March 26, 1998

Chuck Semborski, Environmental Supervisor
Energy West Mining Company
P.O. Box 310
Huntington, Utah 84528

Re: Phase III Bond Release Granted for Channel Canyon Portal Breakouts, PacifiCorp, Cottonwood/Wilberg, ACT/015/019-BR97G, Folder #3, Emery County, Utah

chuck
Dear Mr. Semborski:

The Division approved Phase III bond release for the Channel Canyon breakouts (about 0.01 acres). There is no reduction of the bond amount, but rather termination of jurisdiction under the Utah rules (R645-100-451.200).

Attached is the Division finding and OSM concurrence for this permitting action. If you have any questions, please call Pamela Grubaugh-Littig or Mary Ann Wright.

Sincerely,

Lowell P. Braxton
Acting Director



IN REPLY REFER TO:

United States Department of the Interior

OFFICE OF SURFACE MINING

Reclamation and Enforcement

1999 Broadway, Suite 3320

Denver, Colorado 80202-5733

March 24, 1998

Pamela Grubaugh-Littig,
Permit Supervisor
Division of Oil, Gas and Mining
1594 West North Temple, Suite 1210
P.O. Box 145801
Salt Lake City, Utah 84114-5801

Dear Ms. Grubaugh-Littig:

This is a response to your February 23, 1998, letter request for concurrence on the proposed phase III bond release for the PacifiCorp Cottonwood/Wilberg Mine, Channel Canyon portal breakouts.

In the breakout areas, the permittee mined coal under Federal lease U-47978 and disturbed Federal land surface under the management of the Bureau of Land Management (BLM). BLM participated in the September 23, 1997, bond release inspection and by letter dated October 1, 1997, concurred with the reclamation at the site. The Office of Surface Mining (OSM) did not attend the bond release inspection but has reviewed the bond release application and accompanying photographs of the reclamation work.

As discussed and shown in the bond release application, the permittee sealed and painted black two ventilation portal breakouts in a coal outcrop that occurs on a vertical cliff face. In its bond release decision document, the Utah Division of Oil, Gas and Mining (Division) estimated that only 0.01 acres in this area were disturbed and that all were reclaimed in the portal sealing and painting. Owing to the seals being located on a vertical cliff face, they will not be backfilled, topsoiled, and revegetated. Therefore, the revegetation requirement of the Utah rules at R645-301-357 for a minimum 10-year bond liability period does not apply.

Because of the very small areas involved, the Office of Surface Mining Reclamation and Enforcement (OSM) understands that the Division does not propose to release any bond but rather to terminate jurisdiction under the Utah rules at R645-100-451.200 for the reclamation performed in these areas. Therefore, no reduction will occur in the following bond for the mine:

*Copy From
Act 10/15/019 # 2*

St. Paul Fire and Marine Insurance Company
385 Washington Street
St. Paul, Minnesota 55102

Surety bond policy No. 400JN6138,
issued to PacifiCorp (201 South Main, Suite 2000
Salt Lake City, Utah 84140),
for the Cottonwood/Wilberg Mine,
permit No. ACT/015/019,
in the amount of \$2,071,098.

On the basis of BLM's concurrence and OSM's review of the bond release application and accompanying photographs of the reclamation work, OSM, in accordance with the Federal lands provisions of the Federal regulations at 30 CFR 740.15(d)(3) and article IX, section B of the Federal - State Federal lands cooperative agreement, concurs with the proposed termination of jurisdiction.

If you have any questions on this letter, please call Dennis Winterringer, Senior Environmental Protection Specialist, at (303) 844-1440.

Sincerely,



James F. Fulton, Chief
Denver Field Division



Peter A. Rutledge,
Western Regional Coordinating
Center Bond Approving Officer



State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

Michael O. Leavitt
Governor

Ted Stewart
Executive Director

James W. Carter
Division Director

1594 West North Temple, Suite 1210

Box 145801

Salt Lake City, Utah 84114-5801

801-538-5340

801-359-3940 (Fax)

801-538-7223 (TDD)

February 23, 1998

Dennis Winterringer
Denver Field Division
Office of Surface Mining
Reclamation and Enforcement
1999 Broadway, Suite 3320
Denver, CO 80202-5733

Re: Channel Canyon Breakout - Phase III Bond Release, Cottonwood/Wilberg Mine,
PacifiCorp, ACT/015/019, Folder #3, Emery County, Utah

Dear Mr. Winterringer:

Enclosed please find the decision document for the Phase III bond release for the Channel Canyon Breakout at the Cottonwood/Wilberg Mine. Please review this document and notify the Division of your concurrence or comments. If you have any questions, please call me.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Pamela Grubaugh-Littig'.

Pamela Grubaugh-Littig
Permit Supervisor

Enclosure

cc: Chuck Semborski, Energy West
Price Field Office

O:\015019.CWW\DRAFT\CHNELCYN.WPD

DECISION DOCUMENT
CHANNEL CANYON BREAKOUT
PHASE III BOND RELEASE
COTTONWOOD/WILBERG MINE
ACT/015/019-97G

Background

The Channel Canyon ventilation breakouts consisted of two separate portals which occur on a steep escarpment located in an un-named canyon on the western side of East Mountain. According to the reclamation plan in the Cottonwood/Wilberg plan, two sets of seals were to be constructed at the Channel Canyon Portal. The first set were constructed in December 1990 (approximately 25 feet from the outcrop.) The seals were inspected and approved on May 13, 1997. An additional set of seals were constructed at the outcrop to conform with the near vertical slope. Energy West completed final reclamation of these portal sites as specified in the approved plan on August 1, 1997.

Reclamation activities included constructing a set of seals that conform to the coal outcrop and to blend in with the surrounding environment. Reclamation work included building additional seals at the outcrop, brushing blacktar over the front of the seal to blend in with the natural environment, removing walkway and escape structures, and removing any refuse leftover from the reclamation processes. All materials were flown in and out by helicopter due to the remoteness of the portals. Existing structures were also dismantled and removed from the area.

The portals are located in the coal outcrop on a vertical cliff face. No topsoil was available to be stored during development or reapplied during final reclamation. Without topsoil, seeding of the portal area is unwarranted. No discharges are generated from and no drainage occurs through the portal sites.

These breakouts are located within federal coal lease U-47978 in the SW1/4SW1/4NW1/4 of Section 32, Township 17 South, Range 7 East. Total disturbance associated with the ventilation breakouts is approximately 0.01 acres.

Publication of this permitting action for Phase III bond release for the Channel canyon Breakouts was published in the Emery County Progress on December 9, 16, 23, and 30, 1997. No comments were received. Letters were sent to landowners, no comments were received.

Summary and Findings

The referenced amendment was received in the Price Field Office on September 15, 1997, six copies submitted to Salt Lake Office together with a memorandum on September 16, 1997. A field investigation was conducted on September 23, 1997. Mike Kaminski represented BLM, the land management agency.

Because of the topography, the portals being located on a steep rock escarpment, the final seals constructed next to the escarpment, in addition to other reasons, the area in question cannot be backfilled and topsoiled, and therefore, seeding of the area disturbed by the portal breakouts is unwarranted.

The soils and biology evaluation and findings that Phase I and Phase II bond release are not applicable because the affected area occurs on a solid sandstone escarpment are valid. Further, it is not warranted to topsoil or seed the areas associated with the breakouts and sealing of the portals. Therefore, Phase I and Phase II requirements on soils and biology have been met.

Further, since the area is not backfilled and topsoiled, the disturbed solid rock escarpment area is not subject to erosion. Therefore, no erosion maintenance required.

As related to Phase III, the area is presumed to receive under 25 inches of precipitation a year, the liability period is 10 years¹. However, the 10-year period relates solely to an evaluation period on the effectiveness of the Phase I and Phase II work and maintenance associated therewith. Further, since maintenance is not an issue, the Phase III bond release time frame should be waived.

The soils and revegetation reclamation for final revegetation of all lands disturbed by coal mining and reclamation operations is included in the approved MRP and does not require traditional reclamation on the portal areas in question. (See permittee's amendment application pages 3.6, 3.7, 4.1 and 4.1.1.)

Soils, R645-301-200.

Analysis. Associated with the portal breakouts:

- (1) The two breakouts are each 20 feet wide and 8 feet high. The rock ledge, void of topsoil, is about 45 feet long and with width averages of 4 feet.
- (2) No soils were available, harvested, or stockpiled. The breakout took place on a steep solid rock escarpment.
- (3) The topography is such that topsoil, even if readily available, could not be placed or held on such a steep and solid rock escarpment.

¹ R645-301-357.220. "In areas of more than 26.0 inches average annual precipitation, the period of responsibility will continue for a period of not less than five full years."

Findings. Topsoil placement is unwarranted on this reclamation project.

Biology, R645-301-300.

Analysis. Since soil cannot be placed and held on the escarpment and whereas the escarpment consists of bare rock, seeding is not warranted.

Findings. This area need not be seeded.

Protection of Fish and Wildlife and Related Environmental Values

Analysis. The reclamation and portal sealing will not have any significant impact on wildlife and environmental values. Bats may have utilized the unsealed portal; however, bat populations are only speculative because of the general area being void of surface water.

Findings. The project will not have any significant impact on fish, wildlife, and related values. The operator tarred the front of the seals to better blend with the natural exposed coal seam.

Safety

Analysis. The portals lie on an inaccessible escarpment at the base of a rock strewn canyon, accessible by foot near the Trail Canyon Mine, adjacent to and about one mile east of Emery County Road 506.

Findings. Since the access ladder has been removed, the sealed portals are difficult to access; therefore, pose no human safety hazard.

Land Use, R645-301-400.

Analysis. The post-mining land use is wildlife.

Findings. The post-mining land use is wildlife. Elk droppings were observed. The general area appears to be a winter habitat area for deer and elk. It also provides habitat for birds and small mammals.

Engineering, R645-301-500.

Non-coal Waste

Analysis. No non-coal waste was observed on the solid rock ledge adjacent to the sealed portals, nor on the natural outslope below the portals.

Findings. The permittee has met this requirement.

Coal Waste

Analysis. An insignificant amount of coal fines were observed on the rock ledge adjacent to the portal; however, no lump coal or development waste was observed. The natural outslope below the portal was devoid of coal fines, lump coal, or development waste.

Findings. The permittee has met this requirement.

Portal Seals

Analysis. Double seals have been installed by the permittee. MSHA has approved the portal seals (see letter from MSHA dated July 10, 1997. The outside seal was constructed as required. Backfilling material even if imported would not be held in place.

Findings. The permittee has met these requirements.

Geology/Subsidence, R645-301-600.

Analysis. Only entry mining development has taken place in the Channel Canyon breakout area.

Findings. No subsidence expected in the Channel Canyon breakout area. This is based on Annual Subsidence Surveys (reviewed 1996 report).

Hydrology, R645-301-700.

Analysis. The Hiawatha seam, in which the Channel Canyon breakouts are located, dips away from the breakouts at approximately 3°. Thus, drains have not been installed in the breakout seals. Therefore, no expected buildup of underground water contiguous to the sealed partials will take place.

The area when operation did not require sediment control.

Findings. Drains are unnecessary in the Channel Canyon breakout seals because underground will flow downgrade for the portal seals.

The reclaimed area does not require sediment control since no signs of surface runoff was observed and the area has an excellent stand of native vegetation.

Conclusion and Recommendation

Based on the Division findings, it is recommended that this Phase III bond release for the Channel Canyon breakouts be approved.

U. S. Department of Labor

Mine Safety and Health Administration
P.O. Box 25367
Denver, Colorado 80225-0367



Coal Mine Safety and Health
District 9

JUL 10 1997

Kent Norton
Manager, Health, Safety and Training
Energy West Mining Company
P. O. Box 310, 15 N. Main
Huntington, UT 84528

RE: Trail Mountain Mine
ID No. 42-01211
Channel Canyon Breakouts

Dear Mr. Norton:

The letter dated January 14, 1997, consisting of a cover letter, a detailed drawing of Channel Canyon breakouts, and a location map, requested MSHA to examine the seals at the two drift openings for compliance with federal regulations.

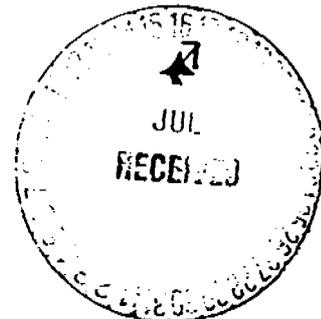
On Tuesday, May 13, 1997, James A. Martin, Coal Mine Inspector, traveled to the site and found that the seals in these two entries do satisfy the regulations in 30 CFR 75.1711.

If you have any questions, please contact this office at 303/231-5462.

Sincerely,

John A. Kuzar
for John A. Kuzar
District Manager

Enclosure





United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Moab District

Price River/San Rafael Resource Area

125 South 600 West

Price, Utah 84501

3482
(UT-066)

Joe Helfrich, Permit Supervisor
Division of Natural Resources
Division of Oil, Gas and Mining
1594 W. North Temple, Suite 1210
Box 145801
Salt Lake City, Utah 84114-5801

OCT - 1 1997

Dear Mr. Helfrich:

The BLM inspected the results of the sealing of the two portal break-outs in the Hiawatha Seam on September 23, 1997. The BLM inspector, Mike Kaminski, was accompanied by Chuck Semborski and Dennis Oakley of Energy West and Bill Malencik and Jess Kelly of Division of Oil, Gas and Mining.

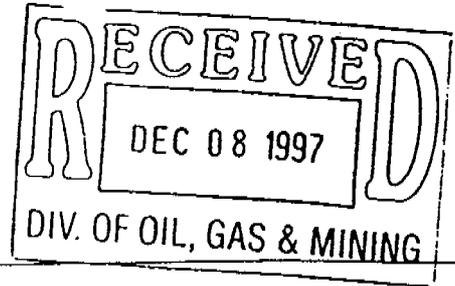
The portals are located on a ledge, midway on an approximate 40-foot vertical cliff face. No topsoil was available to be stored or reapplied. Without soil, seeding the site is futile and should not be attempted. The area above and below the escarpment is well vegetated. The portal seals have been coated with a black tar resembling the rest of the coal outcrop. Standing directly beneath the overhang above the portals, a half dozen or so roof bolts could be seen, despite their being painted to match the surrounding rock. They can only be seen from this position and hence do not constitute a visual obtrusion.

The BLM considers these portals to be satisfactorily sealed and all three phases of rehabilitation completed.

Sincerely,

Area Manager

cc: Chuck Semborski
Geology/Permitting Supervisor
P.O. Box 310
Huntington, Utah 84528



December 4, 1997

Mr. Richard Mannus
Bureau of Land Management
Moab District
Price River/San Rafael Resource Area
125 South 600 West
Price, Utah 84501

*Copy Pam (all)
ACT/015/019 #12*

Dear Mr. Mannus:

As of August 1, 1997, Energy West has completed final reclamation of the Channel Canyon portal breakouts located in Federal Lease U-47978. We are presently applying for Phase III bond release of this area with the Division of Oil, Gas and Mining. As part of the regulations of the Utah Coal Rules, we are required to notify the surface owners stating our intentions. Attached is a copy of the advertisement which will be published in the Emery County Progress, once a week for four consecutive weeks beginning December 9, 1997. Also attached is a copy of the BLM inspection report with your signature.

If you have any questions, or require further information pertaining to the Channel Canyon breakouts, please feel free to call me at 687-4720.

Sincerely,

Chuck Semborski
Geology/Permitting Supervisor

enclosures

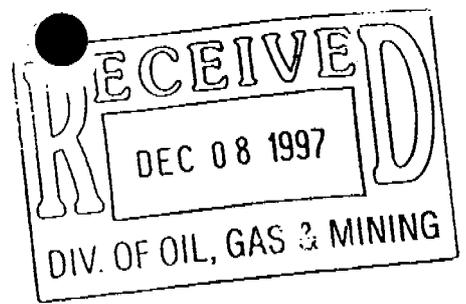
cc: Pam Grubaugh-Littig w/encl. (Division of Oil, Gas and Mining)
Bill Malencik w/encl. (Division of Oil, Gas and Mining)
Scott Childs w/o encl. (InterWest Mining Company)
Blake Webster w/o encl. (InterWest Mining Company)
Susan Tuttle (file)

J:\PCCOMMON\PCCOMMON\ENGI\ENVIRON\MCTW\DOGMPHAS3BLM.D97

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



December 4, 1997

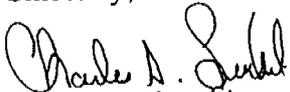
Randy Johnson, Chairman
Emery County Board of Commissioners
P.O. Box 629
Castle Dale, Utah 84513

Dear Mr. Johnson:

As of August 1, 1997, Energy West has completed final reclamation of the Channel Canyon portal breakouts located in Federal Lease U-47978. We are presently applying for Phase III bond release of this area with the Division of Oil, Gas and Mining. As part of the regulations of the Utah Coal Rules, we are required to notify you stating our intentions. Attached is a copy of the advertisement which will be published in the Emery County Progress, once a week for four consecutive weeks beginning December 9, 1997.

The reclamation has been inspected by the BLM and the Division. If you have any questions, or require further information pertaining to the Channel Canyon breakouts, please feel free to call me at 687-4720.

Sincerely,


Chuck Semborski
Geology/Permitting Supervisor

enclosure

do

cc: Pam Grubaugh-Littig w/encl. (Division of Oil, Gas and Mining)
Bill Malencik w/encl. (Division of Oil, Gas and Mining)
Scott Childs w/o encl. (InterWest Mining Company)
Blake Webster w/o encl. (InterWest Mining Company)
Susan Tuttle (file)

J:\PCCOMMON\PCCOMMONENGIN\ENVIRON\MCTW\DOGMPHAS3EC.D97

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

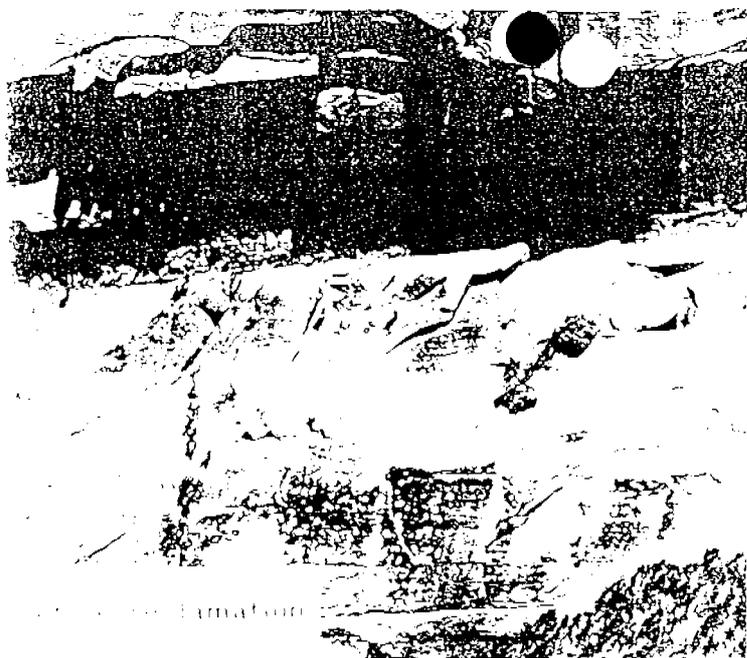
Deer Creek Mine:
(801) 381-2317
Fax (801) 381-2285

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

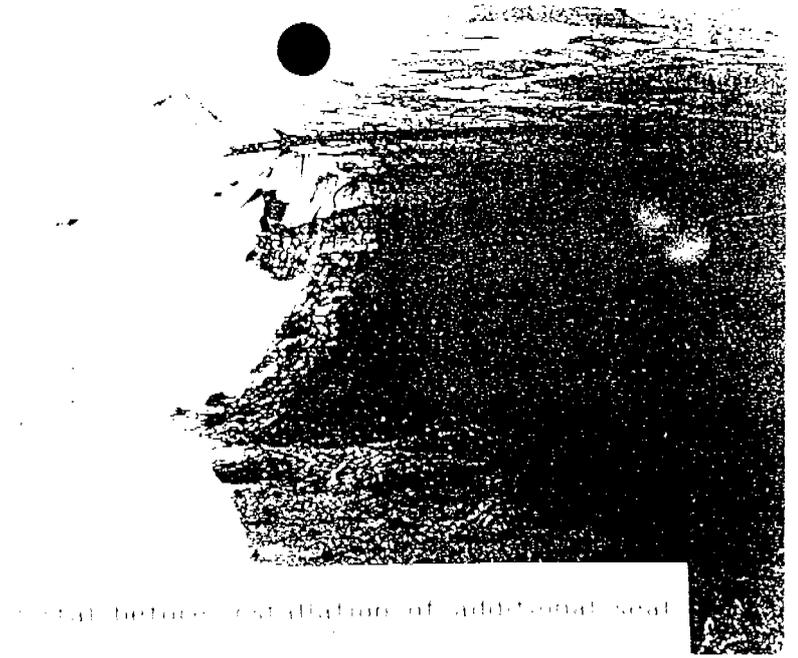


Channel Canyon Portals
Reclamation Project

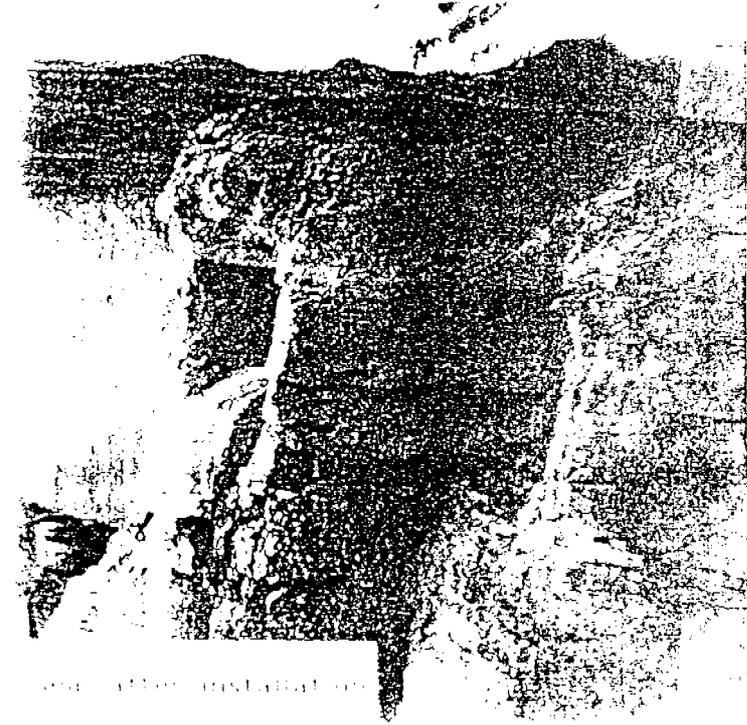
Completed 8/1/97



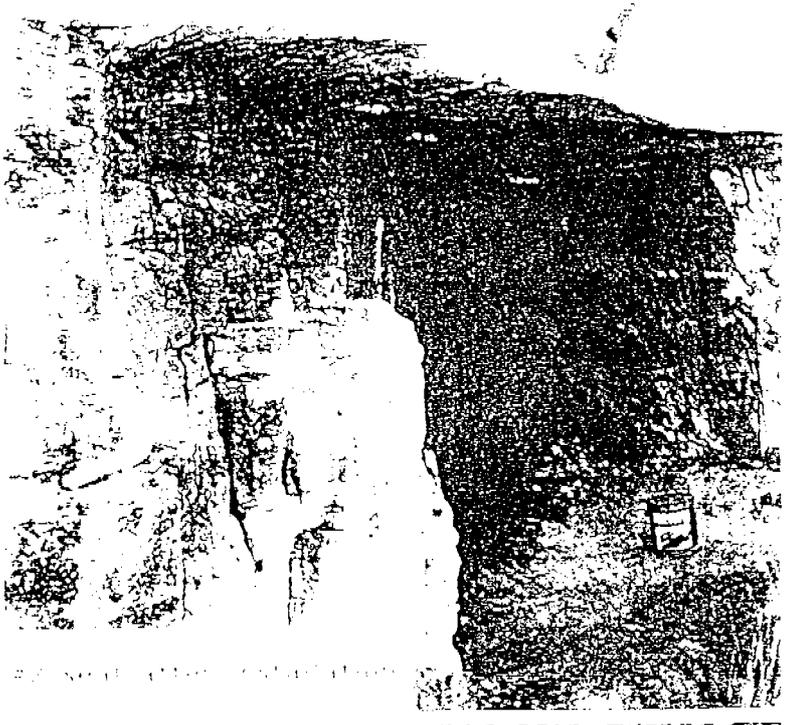
Structure before reclamation



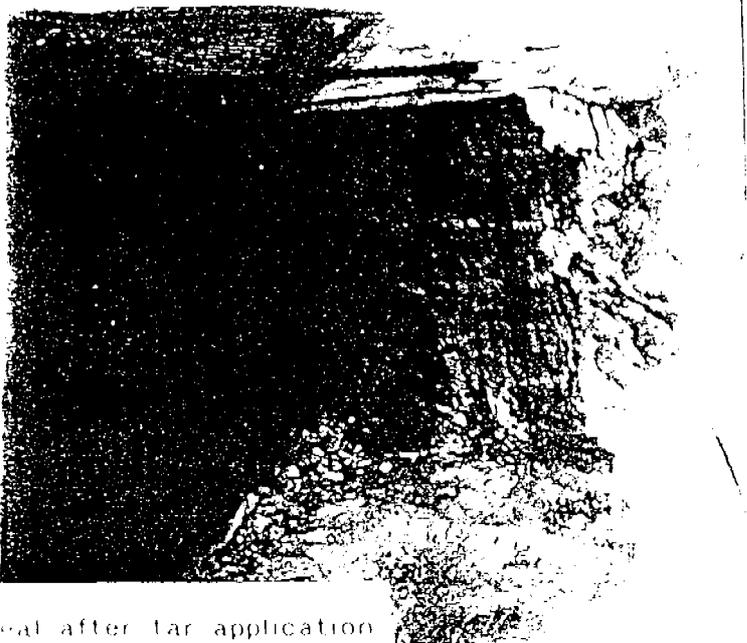
Structure before installation of additional seal



Structure after installation of seal



Structure after installation of seal



Structure after tar application



Structure after reclamation



State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

Michael O. Leavitt
Governor
Ted Stewart
Executive Director
James W. Carter
Division Director

1594 West North Temple, Suite 1210
Box 145801
Salt Lake City, Utah 84114-5801
801-538-5340
801-359-3940 (Fax)
801-538-7223 (TDD)

February 23, 1998

Dennis Winterringer
Denver Field Division
Office of Surface Mining
Reclamation and Enforcement
1999 Broadway, Suite 3320
Denver, CO 80202-5733

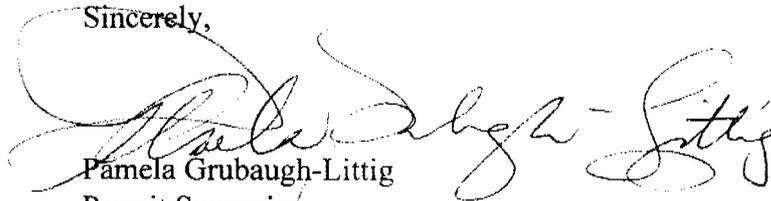
Re: Channel Canyon Breakout - Phase III Bond Release, Cottonwood/Wilberg Mine,
PacifiCorp, ACT/015/019, Folder #3, Emery County, Utah

976

Dear Mr. Winterringer:

Enclosed please find the decision document for the Phase III bond release for the Channel Canyon Breakout at the Cottonwood/Wilberg Mine. Please review this document and notify the Division of your concurrence or comments. If you have any questions, please call me.

Sincerely,



Pamela Grubaugh-Littig
Permit Supervisor

Enclosure

cc: Chuck Semborski, Energy West
Price Field Office

O:\015019.CWW\DRAFT\CHNELCYN.WPD

DECISION DOCUMENT
CHANNEL CANYON BREAKOUT
PHASE III BOND RELEASE
COTTONWOOD/WILBERG MINE
ACT/015/019-97G

Background

The Channel Canyon ventilation breakouts consisted of two separate portals which occur on a steep escarpment located in an un-named canyon on the western side of East Mountain. According to the reclamation plan in the Cottonwood/Wilberg plan, two sets of seals were to be constructed at the Channel Canyon Portal. The first set were constructed in December 1990 (approximately 25 feet from the outcrop.) The seals were inspected and approved on May 13, 1997. An additional set of seals were constructed at the outcrop to conform with the near vertical slope. Energy West completed final reclamation of the these portal sites as specified in the approved plan on August 1, 1997.

Reclamation activities included constructing a set of seals that conform to the coal outcrop and to blend in with the surrounding environment. Reclamation work included building additional seals at the outcrop, brushing blacktar over the front of the seal to blend in with the natural environment, removing walkway and escape structures, and removing any refuse leftover from the reclamation processes. All materials were flown in and out by helicopter due to the remoteness of the portals. Existing structures were also dismantled and removed from the area.

The portals are located in the coal outcrop on a vertical cliff face. No topsoil was available to be stored during development or reapplied during final reclamation. Without topsoil, seeding of the portal area is unwarranted. No discharges are generated from and no drainage occurs through the portal sites.

These breakouts are located within federal coal lease U-47978 in the SW1/4SW1/4NW1/4 of Section 32, Township 17 South, Range 7 East. Total disturbance associated with the ventilation breakouts is approximately 0.01 acres.

Publication of this permitting action for Phase III bond release for the Channel canyon Breakouts was published in the Emery County Progress on December 9, 16, 23, and 30, 1997. No comments were received. Letters were sent to landowners, no comments were received.

Summary and Findings

The referenced amendment was received in the Price Field Office on September 15, 1997, six copies submitted to Salt Lake Office together with a memorandum on September 16, 1997. A field investigation was conducted on September 23, 1997. Mike Kaminski represented BLM, the land management agency.

Because of the topography, the portals being located on a steep rock escarpment, the final seals constructed next to the escarpment, in addition to other reasons, the area in question cannot be backfilled and topsoiled, and therefore, seeding of the area disturbed by the portal breakouts is unwarranted.

The soils and biology evaluation and findings that Phase I and Phase II bond release are not applicable because the affected area occurs on a solid sandstone escarpment are valid. Further, it is not warranted to topsoil or seed the areas associated with the breakouts and sealing of the portals. Therefore, Phase I and Phase II requirements on soils and biology have been met.

Further, since the area is not backfilled and topsoiled, the disturbed solid rock escarpment area is not subject to erosion. Therefore, no erosion maintenance required.

As related to Phase III, the area is presumed to receive under 25 inches of precipitation a year, the liability period is 10 years¹. However, the 10-year period relates solely to an evaluation period on the effectiveness of the Phase I and Phase II work and maintenance associated therewith. Further, since maintenance is not an issue, the Phase III bond release time frame should be waived.

The soils and revegetation reclamation for final revegetation of all lands disturbed by coal mining and reclamation operations is included in the approved MRP and does not require traditional reclamation on the portal areas in question. (See permittee's amendment application pages 3.6, 3.7, 4.1 and 4.1.1.)

Soils, R645-301-200.

Analysis. Associated with the portal breakouts:

- (1) The two breakouts are each 20 feet wide and 8 feet high. The rock ledge, void of topsoil, is about 45 feet long and with width averages of 4 feet.
- (2) No soils were available, harvested, or stockpiled. The breakout took place on a steep solid rock escarpment.
- (3) The topography is such that topsoil, even if readily available, could not be placed or held on such a steep and solid rock escarpment.

¹ R645-301-357.220. "In areas of more than 26.0 inches average annual precipitation, the period of responsibility will continue for a period of not less than five full years."

Findings. Topsoil placement is unwarranted on this reclamation project.

Biology, R645-301-300.

Analysis. Since soil cannot be placed and held on the escarpment and whereas the escarpment consists of bare rock, seeding is not warranted.

Findings. This area need not be seeded.

Protection of Fish and Wildlife and Related Environmental Values

Analysis. The reclamation and portal sealing will not have any significant impact on wildlife and environmental values. Bats may have utilized the unsealed portal; however, bat populations are only speculative because of the general area being void of surface water.

Findings. The project will not have any significant impact on fish, wildlife, and related values. The operator tarred the front of the seals to better blend with the natural exposed coal seam.

Safety

Analysis. The portals lie on an inaccessible escarpment at the base of a rock strewn canyon, accessible by foot near the Trail Canyon Mine, adjacent to and about one mile east of Emery County Road 506.

Findings. Since the access ladder has been removed, the sealed portals are difficult to access; therefore, pose no human safety hazard.

Land Use, R645-301-400.

Analysis. The post-mining land use is wildlife.

Findings. The post-mining land use is wildlife. Elk droppings were observed. The general area appears to be a winter habitat area for deer and elk. It also provides habitat for birds and small mammals.

Engineering, R645-301-500.

Non-coal Waste

Analysis. No non-coal waste was observed on the solid rock ledge adjacent to the sealed portals, nor on the natural outslope below the portals.

Findings. The permittee has met this requirement.

Coal Waste

Analysis. An insignificant amount of coal fines were observed on the rock ledge adjacent to the portal; however, no lump coal or development waste was observed. The natural outslope below the portal was devoid of coal fines, lump coal, or development waste.

Findings. The permittee has met this requirement.

Portal Seals

Analysis. Double seals have been installed by the permittee. MSHA has approved the portal seals (see letter from MSHA dated July 10, 1997. The outside seal was constructed as required. Backfilling material even if imported would not be held in place.

Findings. The permittee has met these requirements.

Geology/Subsidence, R645-301-600.

Analysis. Only entry mining development has taken place in the Channel Canyon breakout area.

Findings. No subsidence expected in the Channel Canyon breakout area. This is based on Annual Subsidence Surveys (reviewed 1996 report).

Hydrology, R645-301-700.

Analysis. The Hiawatha seam, in which the Channel Canyon breakouts are located, dips away from the breakouts at approximately 3°. Thus, drains have not been installed in the breakout seals. Therefore, no expected buildup of underground water contiguous to the sealed partials will take place.

The area when operation did not require sediment control.

Findings. Drains are unnecessary in the Channel Canyon breakout seals because underground will flow downgrade for the portal seals.

The reclaimed area does not require sediment control since no signs of surface runoff was observed and the area has an excellent stand of native vegetation.

Conclusion and Recommendation

Based on the Division findings, it is recommended that this Phase III bond release for the Channel Canyon breakouts be approved.

U. S. Department of Labor

Mine Safety and Health Administration
P.O. Box 25367
Denver, Colorado 80225-0367



Coal Mine Safety and Health
District 9

JUL 10 1997

Kent Norton
Manager, Health, Safety and Training
Energy West Mining Company
P. O. Box 310, 15 N. Main
Huntington, UT 84528

RE: Trail Mountain Mine
ID No. 42-01211
Channel Canyon Breakouts

Dear Mr. Norton:

The letter dated January 14, 1997, consisting of a cover letter, a detailed drawing of Channel Canyon breakouts, and a location map, requested MSHA to examine the seals at the two drift openings for compliance with federal regulations.

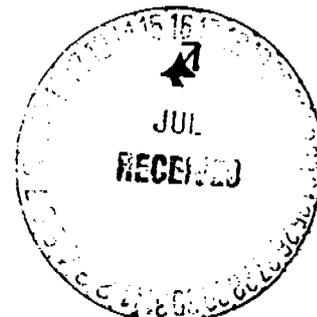
On Tuesday, May 13, 1997, James A. Martin, Coal Mine Inspector, traveled to the site and found that the seals in these two entries do satisfy the regulations in 30 CFR 75.1711.

If you have any questions, please contact this office at 303/231-5462.

Sincerely,

Wickie J. Vigil
for John A. Kuzar
District Manager

Enclosure





United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Moab District
Price River/San Rafael Resource Area
125 South 600 West
Price, Utah 84501

3482
(UT-066)

Joe Helfrich, Permit Supervisor
Division of Natural Resources
Division of Oil, Gas and Mining
1594 W. North Temple, Suite 1210
Box 145801
Salt Lake City, Utah 84114-5801

OCT - 1 1997

Dear Mr. Helfrich:

The BLM inspected the results of the sealing of the two portal break-outs in the Hiawatha Seam on September 23, 1997. The BLM inspector, Mike Kaminski, was accompanied by Chuck Semborski and Dennis Oakley of Energy West and Bill Malencik and Jess Kelly of Division of Oil, Gas and Mining.

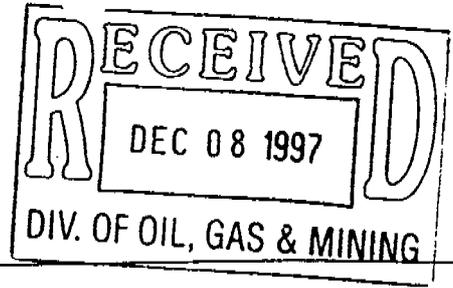
The portals are located on a ledge, midway on an approximate 40-foot vertical cliff face. No topsoil was available to be stored or reapplied. Without soil, seeding the site is futile and should not be attempted. The area above and below the escarpment is well vegetated. The portal seals have been coated with a black tar resembling the rest of the coal outcrop. Standing directly beneath the overhang above the portals, a half dozen or so roof bolts could be seen, despite their being painted to match the surrounding rock. They can only be seen from this position and hence do not constitute a visual obtrusion.

The BLM considers these portals to be satisfactorily sealed and all three phases of rehabilitation completed.

Sincerely,

Area Manager

cc: Chuck Semborski
Geology/Permitting Supervisor
P.O. Box 310
Huntington, Utah 84528



December 4, 1997

Mr. Richard Mannus
Bureau of Land Management
Moab District
Price River/San Rafael Resource Area
125 South 600 West
Price, Utah 84501

*Copy Pam (all)
ACT/015/019 #2*

Dear Mr. Mannus:

As of August 1, 1997, Energy West has completed final reclamation of the Channel Canyon portal breakouts located in Federal Lease U-47978. We are presently applying for Phase III bond release of this area with the Division of Oil, Gas and Mining. As part of the regulations of the Utah Coal Rules, we are required to notify the surface owners stating our intentions. Attached is a copy of the advertisement which will be published in the Emery County Progress, once a week for four consecutive weeks beginning December 9, 1997. Also attached is a copy of the BLM inspection report with your signature.

If you have any questions, or require further information pertaining to the Channel Canyon breakouts, please feel free to call me at 687-4720.

Sincerely,

Chuck Semborski
Geology/Permitting Supervisor

enclosures

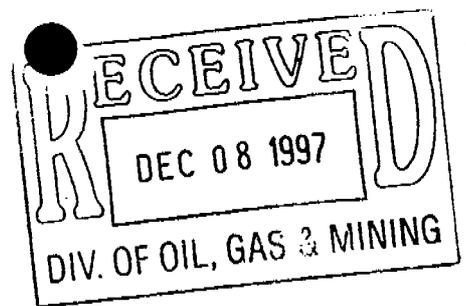
cc: Pam Grubaugh-Littig w/encl. (Division of Oil, Gas and Mining)
Bill Malencik w/encl. (Division of Oil, Gas and Mining)
Scott Childs w/o encl. (InterWest Mining Company)
Blake Webster w/o encl. (InterWest Mining Company)
Susan Tuttle (file)

J:\PCCOMMON\PCCOMMON\ENGINVIRON\MCTW\DOGMPHAS3BLM.D97

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



December 4, 1997

Randy Johnson, Chairman
Emery County Board of Commissioners
P.O. Box 629
Castle Dale, Utah 84513

Dear Mr. Johnson:

As of August 1, 1997, Energy West has completed final reclamation of the Channel Canyon portal breakouts located in Federal Lease U-47978. We are presently applying for Phase III bond release of this area with the Division of Oil, Gas and Mining. As part of the regulations of the Utah Coal Rules, we are required to notify you stating our intentions. Attached is a copy of the advertisement which will be published in the Emery County Progress, once a week for four consecutive weeks beginning December 9, 1997.

The reclamation has been inspected by the BLM and the Division. If you have any questions, or require further information pertaining to the Channel Canyon breakouts, please feel free to call me at 687-4720.

Sincerely,

Chuck Semborski
Geology/Permitting Supervisor

enclosure

do

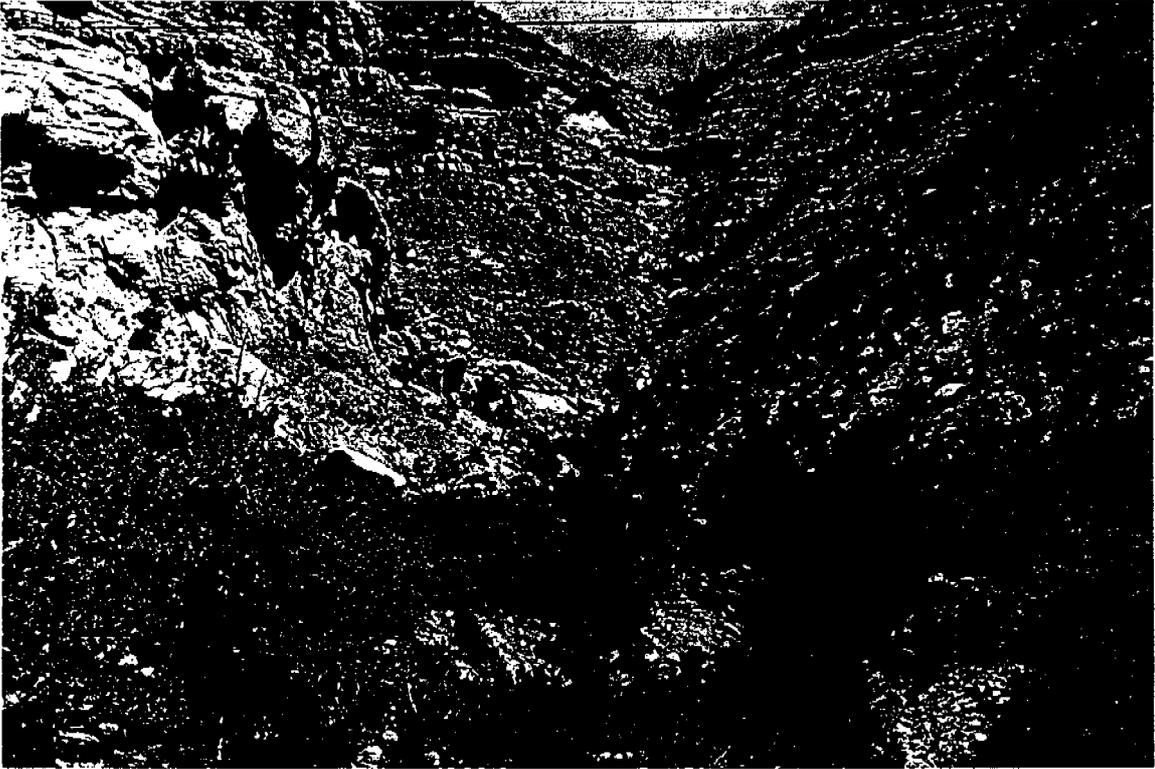
cc: Pam Grubaugh-Littig w/encl. (Division of Oil, Gas and Mining)
Bill Malencik w/encl. (Division of Oil, Gas and Mining)
Scott Childs w/o encl. (InterWest Mining Company)
Blake Webster w/o encl. (InterWest Mining Company)
Susan Tuttle (file)

J:\PCCOMMON\PCCOMMON\ENGI\ENVIRON\MCTW\DOG\M\PHAS3\EC.D97

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

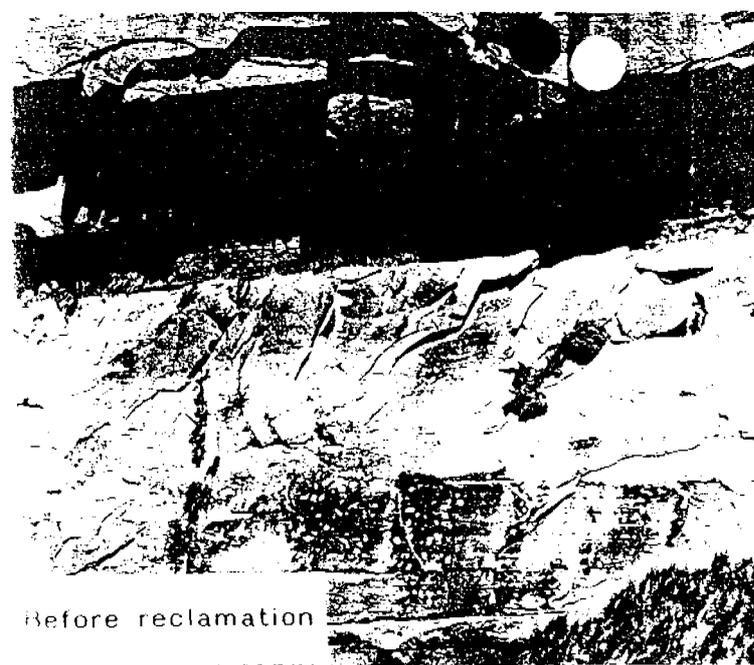
Deer Creek Mine:
(801) 381-2317
Fax (801) 381-2285

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

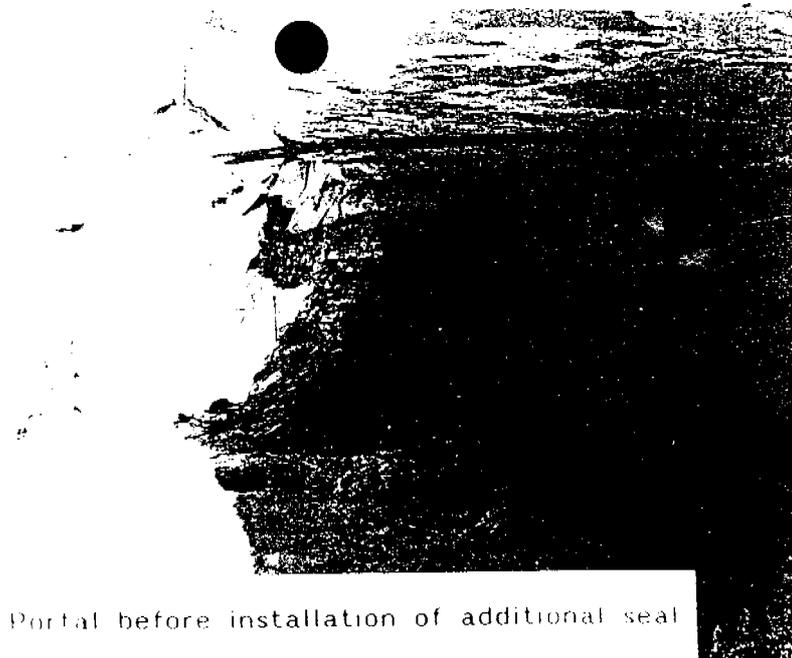


Channel Canyon Portals Reclamation Project

Completed 8/1/97



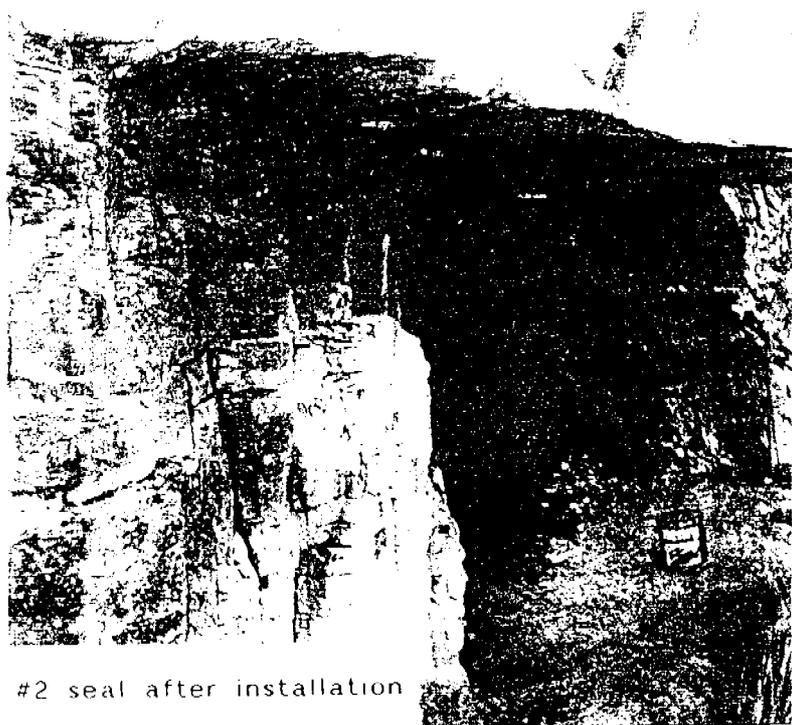
Before reclamation



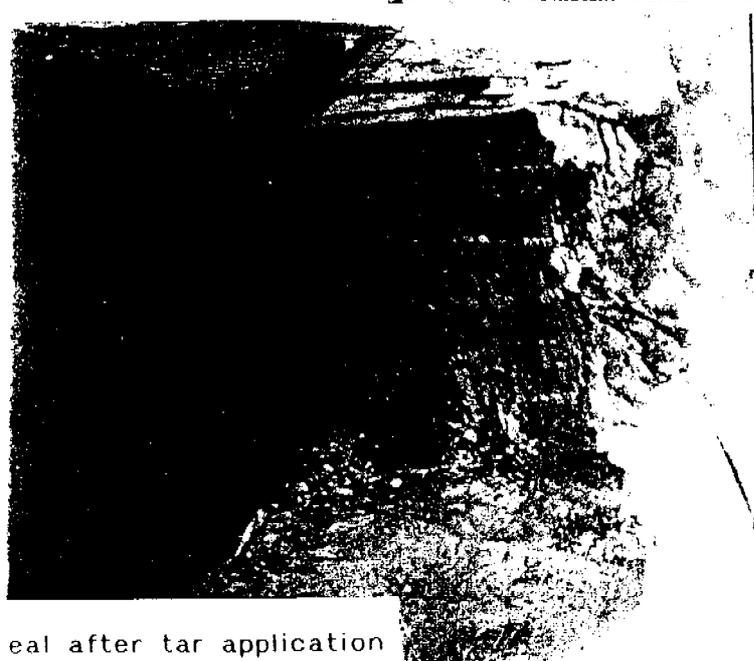
Portal before installation of additional seal



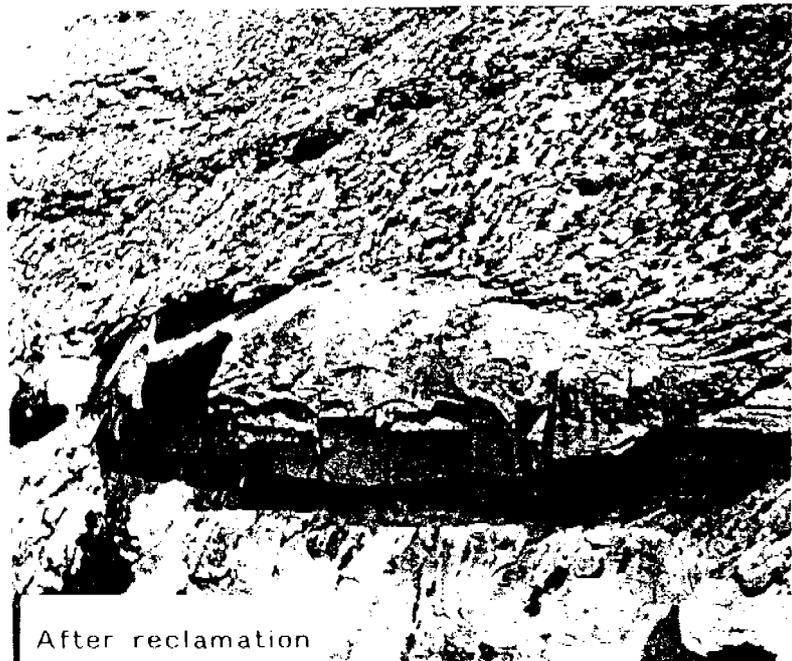
seal after installation



#2 seal after installation



seal after tar application



After reclamation



State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

Michael O. Leavitt
Governor
Ted Stewart
Executive Director
James W. Carter
Division Director

1594 West North Temple, Suite 1210
Box 145801
Salt Lake City, Utah 84114-5801
801-538-5340
801-359-3940 (Fax)
801-538-7223 (TDD)

November 21, 1997

Chuck Semborski, Environmental Supervisor
Energy West
P.O. Box 310
Huntington, Utah 84528

Re: Channel Canyon Breakout, PacifiCorp, Cottonwood Mine, ACT/015/019-97G, Folder #3, Emery County, Utah

Dear Mr. Semborski:

The Channel Canyon portal reclamation amendment was submitted on September 15, 1997 and requested "Phase III bond release and release of the affected portal breakout". A field investigation was conducted at this site on September 23, 1997 with Jess Kelley (DOGM), Bill Malencik (DOGM), Mike Kaminski (BLM), Chuck Semborski (Energy West), and Dennis Oakley (Energy West) in attendance.

This site would be applicable for Phase III bond release due to the fact that the portal is located on a steep rock escarpment and the portal area has been sealed (from the inside). The area cannot be backfilled and topsoiled, and seeding by the portal breakouts is unwarranted. Therefore, Phase I and Phase II requirements for soils and biology have been met. There is an additional requirement, however, for phase II that "no part of the bond or deposit will be released so long as the lands to which the release would be applicable are contributing suspended solids to streamflow or runoff outside the permit area are in excess of the requirements set by UCA 40-10-17 (j) of the Act and by R645-301-751" which must be addressed.

The 10-year liability period could be waived since maintenance is not an issue associated with Phase I and Phase II work.

The bond release process must be followed to achieve Phase III bond release and release from the liability from this area which is outlined in R645-301-880 (enclosed) including advertisement of the bond release and letters sent to appropriate landowners and agencies. The surface owner, agent or lessee must be given notice of the bond release inspection. OSM-WRCC must grant concurrence to the Phase III bond release and should also attend an inspection to evaluate the reclamation work. Therefore, in order for this Phase III bond release application to

Page 2
ACT/015/019-97G
November 21, 1997

proceed , the advertisement, copies of letters to appropriate landowners and agencies, as well as an inspection by the surface owner as well as OSM-WRCC must be conducted to complete the bond release process.

If you have any questions about how to proceed with this bond release , please call me.

Sincerely,

A handwritten signature in cursive script, appearing to read "Pamela Grubaugh-Littig". The signature is written in black ink and is positioned above the printed name and title.

Pamela Grubaugh-Littig
Permit Supervisor

tat
Enclosure
cc: Price Field Office
O:\015019.CWWW\FINAL\CHNCYN.WPD

- 860.324.4. Annual reports for the five years immediately preceding the time of application.
- 860.330. The Division may accept a written guarantee for an applicant's self bond from a parent corporation guarantor, if the guarantor meets the conditions of R645-301-860.321 through R645-301-860.324 as if it were the applicant. Such a written guarantee will be referred to as a "corporate guarantee." The terms of the corporate guarantee will provide for the following:
- 860.331. If the applicant fails to complete the reclamation plan, the guarantor will do so or the guarantor will be liable under the indemnity agreement to provide funds to the Division sufficient to complete the reclamation plan, but not to exceed the bond amount;
- 860.332. The corporate guarantee will remain in force unless the guarantor sends notice of cancellation by certified mail to the applicant and to the Division at least 90 days in advance of the cancellation date, and the Division accepts the cancellation; and
- 860.333. The cancellation may be accepted by the Division if the applicant obtains a suitable replacement bond before the cancellation date or if the lands for which the self bond, or portion thereof, was accepted have not been disturbed.
- 860.340. The Division may accept a written guarantee for an applicant's self bond from any corporate guarantor, whenever the applicant meets the conditions of R645-301-860.321, R645-301-860.322, and R645-301-860.324 and the guarantor meets the conditions of R645-301-860.321 through R645-301-860.324 as if it were the applicant. Such a written guarantee will be referred to as a "nonparent corporate guarantee." The terms of this guarantee will provide for compliance with the conditions of R645-301-860.331 through R645-301-860.333. The Division may require the applicant to submit any information specified in R645-301-860.323 in order to determine the financial capabilities of the applicant.
- 860.350. For the Division to accept an applicant's self bond, the total amount of the outstanding and proposed self bonds of the applicant for coal mining and reclamation operations will not exceed 25 percent of the applicant's tangible net worth in the United States. For the Division to accept a corporate guarantee, the total amount of the parent corporation guarantor's present and proposed self bonds and guaranteed self bonds for surface coal mining and reclamation operations will not exceed 25 percent of the guarantor's tangible net worth in the United States. For the Division to accept a nonparent corporate guarantee, the total amount of the nonparent corporate guarantor's present and proposed self bonds and guaranteed self bonds will not exceed 25 percent of the guarantor's tangible net worth in the United States.
- 860.360. If the Division accepts an applicant's self bond, an indemnity agreement will be submitted subject to the following requirements:
- 860.361. The indemnity agreement will be executed by all persons and parties who are to be bound by it, including the parent corporation guarantor, and will bind each jointly and severally;
- 860.362. Corporations applying for a self bond, and parent and nonparent corporations guaranteeing an applicant's self bond shall submit an indemnity agreement signed by two corporate officers who are authorized to bind their corporations. A copy of such authorization shall be provided to the Division along with an affidavit certifying that such an agreement is valid under all applicable federal and Utah laws. In addition, the guarantor shall provide a copy of the corporate authorization demonstrating that the corporation may guarantee the self bond and execute the indemnity agreement.
- 860.363. If the applicant is a partnership, joint venture or syndicate, the agreement will bind each partner or party who has a beneficial interest, directly or indirectly, in the applicant;
- 860.364. Pursuant to R645-301-880.900, the applicant, parent or nonparent corporate guarantor shall be required to complete the approved reclamation plan for the lands in default or to pay to the Division an amount necessary to complete the approved reclamation plan, not to exceed the bond amount.
- 860.365. The indemnity agreement when under forfeiture will operate as a judgment against those parties liable under the indemnity agreement.
- 860.370. The Division may require self-bonded applicants, parent and nonparent corporate guarantors to submit an update of the information required under R645-301-860.323 and R645-301-860.324 within 90 days after the close of each fiscal year following the issuance of the self bond or corporate guarantee.
- 860.380. If at any time during the period when a self bond is posted, the financial conditions of the applicant, parent, or nonparent corporate guarantor change so that the criteria of R645-301-860.323 and R645-301-860.340 are not satisfied, the permittee will notify the Division immediately and will within 90 days post an alternate form of bond in the same amount as the self bond. Should the permittee fail to post an adequate substitute bond, the provisions of R645-301-840.500 will apply.
- 870. Replacement of Bonds.**
- 870.100. The Division may allow a permittee to replace existing bonds with other bonds that provide equivalent coverage.
- 870.200. The Division will not release existing performance bonds until the permittee has submitted, and the Division has approved, acceptable replacement performance bonds. Replacement of a performance bond pursuant to this section will not constitute a release of bond under R645-301-880.100 through R645-301-880.800.
- 880. Requirement to Release Performance Bonds.**
- 880.100. Bond release application.
- 880.110. The permittee may file an application with the Division for the release of all or part of a performance bond. Applications may be filed only at times or during seasons authorized by the Division in order to properly evaluate the completed reclamation operations. The times or seasons appropriate for the evaluation of certain types of reclamation will be identified in the approved mining and reclamation plan.
- 880.120. Within 30 days after an application for bond release has been filed with the Division, the operator will submit a

copy of an advertisement placed at least once a week for four successive weeks in a newspaper of general circulation in the locality of the coal mining and reclamation operations. The advertisement will be considered part of any bond release application and will contain the permittee's name, permit number and approval date, notification of the precise location of the land affected, the number of acres, the type and amount of the bond filed and the portion sought to be released, the type and appropriate dates of reclamation work performed, a description of the results achieved as they relate to the operator's approved reclamation plan and the name and address of the Division to which written comments, objections, or requests for public hearings and informal conferences on the specific bond release may be submitted pursuant to R645-301-880.600 and R645-301-880.800. In addition, as part of any bond release application, the applicant will submit copies of letters which he or she has sent to adjoining property owners, local governmental bodies, planning agencies, sewage and water treatment authorities, and water companies in the locality in which the coal mining and reclamation operation took place, notifying them of the intention to seek release from the bond.

880.200. Inspection by the Division.

880.210. Upon receipt of the bond release application, the Division will, within 30 days, or as soon thereafter as weather conditions permit, conduct an inspection and evaluation of the reclamation work involved. The evaluation will consider, among other factors, the degree of difficulty to complete any remaining reclamation, whether pollution of surface and subsurface water is occurring, the probability of future occurrence of such pollution and the estimated cost of abating such pollution. The surface owner, agent or lessee will be given notice of such inspection and may participate with the Division in making the bond release inspection. The Division may arrange with the permittee to allow access to the permit area, upon request of any person with an interest in bond release, for the purpose of gathering information relevant to the proceeding.

880.220. Within 60 days from the filing of the bond release application, if no public hearing is held pursuant to R645-301-880.600, or, within 30 days after a public hearing has been held pursuant to R645-301-880.600, the Division will notify in writing the permittee, the surety or other persons with an interest in bond collateral who have requested notification under R645-301-860.260 and the persons who either filed objections in writing or objectors who were a party to the hearing proceedings, if any, if its decision to release or not to release all or part of the performance bond.

880.300. The Division may release all or part of the bond for the entire permit area if the Division is satisfied that all the reclamation or a phase of the reclamation covered by the bond or portion thereof has been accomplished in accordance with the following schedules for reclamation of Phases I, II and III:

880.310. At the completion of Phase I, after the operator completes the backfilling and regrading (which may include the replacement of topsoil) and drainage control of a bonded area in accordance with the approved reclamation plan, 60 percent of the bond or collateral for the applicable area;

880.320. At the completion of Phase II, after revegetation has been established on the regraded mined lands in accordance with the approved reclamation plan, an additional amount of bond. When determining the amount of bond to be released after successful revegetation has been established, the Division will retain that amount of bond for the revegetated area which would be sufficient to cover the cost of reestablishing revegetation if completed by a third party and for the period specified for operator responsibility in UCA 40-10-17(t) of the Act for reestablishing revegetation. No part of the bond or deposit will be released under this paragraph so long as the lands to which the release would be applicable are contributing suspended solids to streamflow or runoff outside the permit area in excess of the requirements set by UCA 40-10-17(j) of the Act and by R645-301-751 or until soil productivity for prime farmlands has returned to the equivalent levels of yield as nonmined land of the same soil type in the surrounding area under equivalent management practices as determined from the soil survey performed pursuant to UCA 40-10-11(4) of the Act and R645-301-200. Where a silt dam is to be retained as a permanent impoundment pursuant to R645-301-700, the Phase II portion of the bond may be released under this paragraph so long as provisions for sound future maintenance by the operator or the landowner have been made with the Division; and

880.330. At the completion of Phase III, after the operator has completed successfully all surface coal mining and reclamation operations, the release of the remaining portion of the bond, but not before the expiration of the period specified for operator responsibility in R645-301-357. However, no bond will be fully released under provisions of this section until reclamation requirements of the Act and the permit are fully met.

880.400. If the Division disapproves the application for release of the bond or portion thereof, the Division will notify the permittee, the surety, and any person with an interest in collateral as provided for in R645-301-860.260, in writing, stating the reasons for disapproval and recommending corrective actions necessary to secure the release and allowing an opportunity for a public hearing.

880.500. When an application for total or partial bond release is filed with the Division, the Division will notify the municipality in which the coal mining and reclamation activities are located by certified mail at least 30 days prior to the release of all or a portion of the bond.

880.600. Any person with a valid legal interest which might be adversely affected by release of the bond, or the responsible officer or head of any federal, state, or local governmental agency which has jurisdiction by law or special expertise with respect to any environmental, social or economic impact involved in the operation or which is authorized to develop and enforce environmental standards with respect to such operations, will have the right to file written objections to the proposed release from bond with the Division within 30 days after the last publication of the notice required by R645-301-880.120. If written objections are filed and a hearing is requested, the Division will inform all the interested parties of the time and place of the hearing and will hold a public hearing within 30 days after receipt of the request for the hearing. The date, time and location of the public hearing will be advertised by the Division in a newspaper of general circulation in the locality for two consecutive weeks. The

public hearing will be held in the locality of the coal mining and reclamation operations from which bond release is sought, or at the location of the Division office, at the option of the objector.

- 880.700. For the purpose of the hearing under R645-301-880.600, the Division will have the authority to administer oaths, subpoena witnesses or written or printed material, compel the attendance of witnesses or the production of materials and take evidence including, but not limited to, inspection of the land affected and other surface coal mining operations carried on by the applicant in the general vicinity. A verbatim record of each public hearing will be made and a transcript will be made available on the motion of any party or by order of the Division.
- 880.800. Without prejudice to the right of an objector or the applicant, the Division may hold an informal conference as provided in UCA 40-10-13(a) of the Act to resolve such written objections. The Division will make a record of the informal conference unless waived by all parties, which will be accessible to all parties. The Division will also furnish all parties of the informal conference with a written finding of the Division based on the informal conference and the reasons for said finding.
- 880.900. Forfeiture of Bonds.
- 880.910. If an operator refuses or is unable to conduct reclamation of an unabated violation, if the terms of the permit are not met, or if the operator defaults on the conditions under which the bond was accepted, the Division will take the following action to forfeit all or part of a bond or bonds for any permit area or an increment of a permit area:
- 880.911. Send written notification by certified mail, return receipt requested, to the permittee and the surety on the bond, if any, informing them of the determination to forfeit all or part of the bond including the reasons for the forfeiture and the amount to be forfeited. The amount will be based on the estimated total cost of achieving the reclamation plan requirements;
- 880.912. Advise the permittee and surety, if applicable, of the conditions under which forfeiture may be avoided. Such conditions may include, but are not limited to:
- 880.912.1. Agreement by the permittee or another party to perform reclamation operations in accordance with a compliance schedule which meets the conditions of the permit, the reclamation plan and the State Program and a demonstration that such party has the ability to satisfy the conditions; or
- 880.912.2. The Division may allow a surety to complete the reclamation plan, or the portion of the reclamation plan applicable to the bonded phase or increment, if the surety can demonstrate an ability to complete the reclamation in accordance with the approved reclamation plan. Except where the Division may approve partial release authorized under R645-301-880.100 through R645-301-880.800, no surety liability will be released until successful completion of all reclamation under the terms of the permit, including applicable liability periods of R645-301-820.300.
- 880.920. In the event forfeiture of the bond is required by this section, the Division will:
- 880.921. Proceed to collect the forfeited amount as provided by applicable laws for the collection of defaulted bonds or other debts if actions to avoid forfeiture have not been taken, or if rights of appeal, if any, have not been exercised within a time established by the Division, or if such appeal, if taken, is unsuccessful; and
- 880.922. Use funds collected from bond forfeiture to complete the reclamation plan, or portion thereof, on the permit area or increment, to which bond coverage applies.
- 880.930. Upon default, the Division may cause the forfeiture of any and all bonds deposited to complete reclamation for which the bonds were posted. Bond liability will extend to the entire permit area under conditions of forfeiture.
- 880.931. In the event the estimated amount forfeited is insufficient to pay for the full cost of reclamation, the operator will be liable for remaining costs. The Division may complete, or authorize completion of, reclamation of the bonded area and may recover from the operator all costs of reclamation in excess of the amount forfeited.
- 880.932. In the event the amount of performance bond forfeited was more than the amount necessary to complete reclamation, the unused funds will be returned by the Division to the party from whom they were collected.
- 890. Terms and Conditions for Liability Insurance.**
- 890.100. The Division will require the applicant to submit as part of its permit application a certificate issued by an insurance company authorized to do business in Utah certifying that the applicant has a public liability insurance policy in force for the coal mining and reclamation activities for which the permit is sought. Such policy will provide for personal injury and property damage protection in an amount adequate to compensate any persons injured or property damaged as a result of the coal mining and reclamation operations, including the use of explosives and who are entitled to compensation under the applicable provisions of state law. Minimum insurance coverage for bodily injury and property damage will be \$300,000 for each occurrence and \$500,000 aggregate.
- 890.200. The policy will be maintained in full force during the life of the permit or any renewal thereof, including the liability period necessary to complete all reclamation operations under this chapter.
- 890.300. The policy will include a rider requiring that the insurer notify the Division whenever substantive changes are made in the policy including any termination or failure to renew.
- 890.400. The Division may accept from the applicant, in lieu of a certificate for a public liability insurance policy, satisfactory evidence from the applicant that it satisfies applicable state self-insurance requirements approved as part of the State Program and the requirements of R645-301-890.100 through R645-301-890.300.

KEY: reclamation, coal mines
December 18, 1995

40-10-1 et seq.



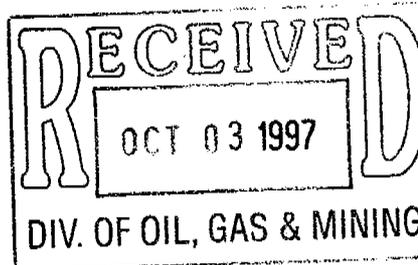
United States Department of the Interior

Bill
Jesse

BUREAU OF LAND MANAGEMENT
Moab District
Price River/San Rafael Resource Area
125 South 600 West
Price, Utah 84501

3482
(UT-066)

Joe Helfrich, Permit Supervisor
Division of Natural Resources
Division of Oil, Gas and Mining
1594 W. North Temple, Suite 1210
Box 145801
Salt Lake City, Utah 84114-5801



OCT - 1 1997

Copy Joe = PAM

ACT/015/019-97/9

Dear Mr. Helfrich:

The BLM inspected the results of the sealing of the two portal break-outs in the Hiawatha Seam on September 23, 1997. The BLM inspector, Mike Kaminski, was accompanied by Chuck Semborski and Dennis Oakley of Energy West and Bill Malencik and Jess Kelly of Division of Oil, Gas and Mining.

The portals are located on a ledge, midway on an approximate 40-foot vertical cliff face. No topsoil was available to be stored or reapplied. Without soil, seeding the site is futile and should not be attempted. The area above and below the escarpment is well vegetated. The portal seals have been coated with a black tar resembling the rest of the coal outcrop. Standing directly beneath the overhang above the portals, a half dozen or so roof bolts could be seen, despite their being painted to match the surrounding rock. They can only be seen from this position and hence do not constitute a visual obtrusion.

The BLM considers these portals to be satisfactorily sealed and all three phases of rehabilitation completed.

Sincerely,

Area Manager

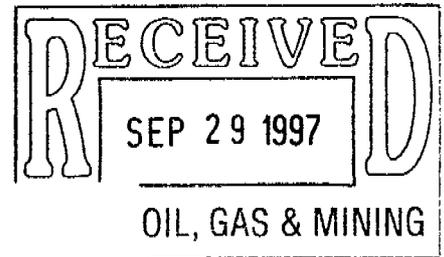
cc: Chuck Semborski
Geology/Permitting Supervisor
P.O. Box 310
Huntington, Utah 84528



State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

Michael O. Leavitt
Governor
Ted Stewart
Executive Director
James W. Carter
Division Director

1594 West North Temple, Suite 1210
Box 145801
Salt Lake City, Utah 84114-5801
(801) 538-5340
(801) 359-3940 (Fax)



September 26, 1997

To: File

Thru: Joe Helfrich, Permit Supervisor, Compliance *JH*

From: Wm. J. Malencik, Reclamation Specialist *WJM*
Jess Kelley, Reclamation Specialist *JK*

RE: Channel Canyon Portals Reclamation, PacifiCorp, Cottonwood Mine, ACT/015/019-97G, Folder #2, Emery County, Utah

Summary

The referenced amendment was received in the Price Field Office on September 15, 1997, six copies submitted to Salt Lake Office together with a memorandum on September 16, 1997. Mr. Helfrich made a determination that Jess Kelley and Bill Malencik would represent the Division on this matter. A field investigation was conducted on September 23, 1997. Mike Kaminski represented BLM, the land management agency. We asked Mr. Kaminski to have an appropriate BLM official send a letter of recommendation to you. Should you not receive such a letter please contact him.

The permittee, in his transmittal letter of September 10, 1997, has made the following request and supported by data in the amendment together with certain administrative processing conclusions:

- (1) "Phase I and Phase II (bond release) is not applicable in the case of Channel Canyon breakouts since the affected area occurs on a solid sandstone escarpment."
- (2) "Phase III (bond release) of the reclamation was completed as described above for final reclamation," and
- (3) "In addition to this amendment, an application for reclamation release of the affected portal area will be filed with the Division."



The inspector's summary follows:

- I. Because of the topography, the portals being located on a steep rock escarpment, the final seals constructed next to the escarpment, in addition to other reasons, the area in question cannot be backfilled and topsoiled.
- II. For the reasons cited in I above, seeding of the area disturbed by the portal breakouts is unwarranted.
- III. Our soils and biology evaluation and findings are that the permittee's conclusions are valid. Further, it is not warranted to topsoil or seed the areas associated with the breakouts and sealing of the portals. Therefore, Phase I and Phase II requirements on soils and biology have been met.

Further, since the area is not backfilled and topsoiled, the disturbed solid rock escarpment area is not subject to erosion. Therefore, no erosion maintenance required.

- IV. A phone conversation with Mr. Semborski clarified PacifiCorp's intentions. He advised me they are seeking Phase I, II, and III bond release, but not a reduction of their reclamation surety bond. This then provides clarifications of quotes (1), (2), and (3) from the permittee's transmittal letter.
- V. As related to Phase III, since the area is presumed to receive under 25 inches of precipitation a year, the liability period is 10 years¹. However, the permittee's position appears to be that the 10-year period relates solely to an evaluation period on the effectiveness of the Phase I and Phase II work and maintenance associated therewith. Further, since maintenance is not an issue, the Phase III bond release time frame should be waived.

Approved Reclamation Plan.

The soils and revegetation reclamation for final revegetation of all lands disturbed by coal mining and reclamation operations is included in the approved MRP and does not require traditional reclamation on the portal areas in question. (See permittee's amendment application pages 3.6, 3.7, 4.1 and 4.1.1.)

¹ R645-301-357.220. "In areas of more than 26.0 inches average annual precipitation, the period of responsibility will continue for a period of not less than five full years."

Soils, R645-301-200.

Analysis. Associated with the portal breakouts:

- (1) The two breakouts are each 20 feet wide and 8 feet high. The rock ledge, void of topsoil, is about 45 feet long and with width averages of 4 feet.
- (2) No soils were available, harvested, or stockpiled. The breakout took place on a steep solid rock escarpment.
- (3) The topography is such that topsoil, even if readily available, could not be placed or held on such a steep and solid rock escarpment.

Findings. Support the permittee's conclusion that topsoil placement is unwarranted on this reclamation project.

Biology, R645-301-300.

Analysis. Since soil cannot be placed and held on the escarpment and whereas the escarpment consists of bare rock, seeding is not warranted.

Findings. Support the permittee's conclusion that the area need not be seeded.

Protection of Fish and Wildlife and Related Environmental Values

Analysis. The reclamation and portal sealing will not have any significant impact on wildlife and environmental values. Bats may have utilized the unsealed portal; however, bat populations are only speculative because of the general area being void of surface water.

Findings. The project will not have any significant impact on fish, wildlife, and related values. The operator has tarred the front of the seals to better blend with the natural exposed coal seam.

Safety

Analysis. The portals lie on an inaccessible escarpment at the base of a rock strewn canyon, accessible by foot near the Trail Canyon Mine, adjacent to and about one mile east of Emery County Road 506.

Findings. Since the access ladder has been removed, the sealed portals are difficult to access; therefore, pose no human safety hazard.

Land Use, R645-301-400.

Analysis. The post-mining land use is wildlife.

Findings. The post-mining land use is wildlife. Elk droppings were observed. The general area appears to be a winter habitat area for deer and elk. It also provides habitat for birds and small mammals.

Engineering, R645-301-500.

Non-coal Waste

Analysis. No non-coal waste was observed on the solid rock ledge adjacent to the sealed portals, nor on the natural outslope below the portals.

Findings. The permittee has met this requirement.

Coal Waste

Analysis. An insignificant amount of coal fines were observed on the rock ledge adjacent to the portal; however, no lump coal or development waste was observed. The natural outslope below the portal was devoid of coal fines, lump coal, or development waste.

Findings. The permittee has met this requirement.

Portal Seals

Analysis. Double seals have been installed by the permittee. MSHA has approved the portal seals (see letter provided in the application). We observed the outside seal and it was constructed as required. Backfilling material even if imported would not be held in place.

Findings. The permittee has met these requirements.

Geology/Subsidence, R645-301-600.

Analysis. Only entry mining development has taken place in the Channel Canyon breakout area.

Findings. No subsidence expected in the Channel Canyon breakout area. This is based on Annual Subsidence Surveys (reviewed 1996 report).

Hydrology, R645-301-700.

Analysis. The Hiawatha seam, in which the Channel Canyon breakouts are located, dips away from the breakouts at approximately 3°. Thus, drains have not been installed in the breakout seals. Therefore, no expected buildup of underground water contiguous to the sealed partials will take place.

The area when operation^{NG} did not require sediment control.

Findings. Drains are unnecessary in the Channel Canyon breakout seals because underground will flow downgrade^{rem} for the portal seals.

The reclaimed area does not require sediment control since no signs of surface runoff^{WERE} was observed and the area has an excellent stand of native vegetation.

Responding to the following questions will perhaps provide a framework under the Utah Coal Rules to fully address this amendment and the anomalies it presents:

- (1) Is the ten year period footnoted herein a mandatory requirement or can exceptions, when justified, be granted on such De minimis cases?
- (2) Is the bond release process, BLM and Division, such that phase III bond release is a pre-requisite to lease relinquishment?



State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

Michael O. Leavitt
Governor
Ted Stewart
Executive Director
James W. Carter
Division Director

1594 West North Temple, Suite 1210
Box 145801
Salt Lake City, Utah 84114-5801
801-538-5340
801-359-3940 (Fax)
801-538-7223 (TDD)

September 23, 1997

Chuck Semborski, Geology/Environmental Supervisor
Energy West Mining Company
P.O. Box 310
Huntington, Utah 84528

Re: Final Reclamation of Channel Canyon Portals, PacifiCorp, Cottonwood/Wilberg Mine, ACT/015/019-97G, Folder #2, Emery County, Utah

Dear Mr. Semborski:

A site visit to evaluate the reclamation of the outcrop seals at the Channel Canyon Portals has been scheduled for September 23, 1997 with Messrs Bill Malencik and Jess Kelley from the Division. Upon completion of the field review, we anticipate reviewing your proposal by October 7, 1997.

A copy of the amendment will be available at the Salt Lake and Price Offices by review by other interested parties. If you have any questions please call.

Sincerely,

Joseph C. Helfrich
Permit Supervisor

tat

cc: Ranvir Singh, OSM
Richard Manus, BLM
Janette S. Kaiser, USFS
Mark Page, Water Rights
Dave Ariotti, DEQ
Bill Bates, DWR
Bill Malencik, DOGM
Price Field Office

O:\015019.CWW\FINAL\TRANSMTL.97G