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# State of Utah

DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF OIL, GAS AND MINING

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December 15, 1997

TO: Pamela Grubaugh-Littig, Permit Coordinator *pgl*  
THRU: Daron Haddock, Permit Supervisor *DH*  
FROM: Jess Kelley, Reclamation Specialist *JK*  
RE: Reclamation of Cottonwood Fan Portal, Round 2, PacifiCorp, Trail Mountain Mine, ACT/015/019-AM97C-1, Folder #2, Emery County, Utah

## SUMMARY:

The Cottonwood Fan Portal area was initially disturbed in the early 1980s. At that time, it was the intention of the permittee to construct a fan portal and a facilities pad there. However, conditions changed and this plan was never carried out. The salvaged topsoil and subsoil material remained where they had been stockpiled and the cuts for the planned facilities remained, but no facilities were built and nothing further was done with the area.

In 1995, the permittee notified the Division that it planned to reclaim the area sometime in the spring and summer of 1997. The Division then decided to review the reclamation plan, which it had approved in the 1980s, for technical adequacy and regulatory compliance. The Division found the reclamation plan to be technically and regulatorily deficient and remanded it to the permittee for revision.

The permittee resubmitted the reclamation plan, for Division review, in July of 1997. The Division found a number of deficiencies in that submittal and again returned it to the permittee for revision and correction. This writer found only one deficiency in the submittal, and that was the fact that, because of the changes in the reclamation plan, the reclamation cost estimate was no longer valid. This writer stipulated in his review that the Division would review the reclamation cost estimate when all other deficiencies had been corrected and the reclamation plan was acceptable to the Division.

The permittee again submitted the reclamation plan for Division review in October of 1997. This memorandum is the result of this writer's review of that submittal.

**TECHNICAL ANALYSIS:**

**RECLAMATION PLAN**

**BONDING AND INSURANCE REQUIREMENTS**

**Analysis:**

**Determination of bond amount.**

Since the plan has not yet been determined to be acceptable in all respects to the Division, this writer's stipulation to the plan, as set forth in his review of the July 1997 submittal, still stands. That is, after the details of the reclamation plan have been worked out and the entire plan is acceptable to the Division, the permittee shall submit a revised overall reclamation cost estimate and, if necessary, revise the reclamation bond in accordance with that estimate.

**Findings:**

The plan does not fulfill the requirements of this section.

As stipulated in the Division review of the July 1997 submittal, the permittee must provide the following, prior to approval, in accordance with the requirements of:

**R645-301-542.800, R645-301-820.100**

After the details of the reclamation plan have been worked out and the entire plan is acceptable to the Division, the permittee will submit a revised overall reclamation cost estimate and, if necessary, revise the reclamation bond in accordance with that estimate.

**RECOMMENDATION:**

As discussed above, it is recommended that, after the Division finds the plan acceptable, but before it formally approves the plan, the permittee submit a revised overall reclamation cost estimate and, if necessary, revise the reclamation bond according to that estimate.