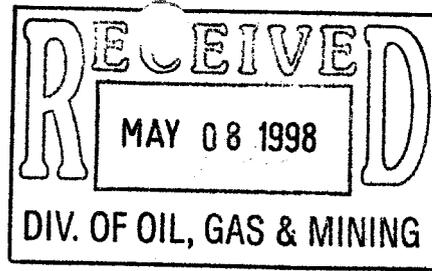


0024



May 6, 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: Pamela Grubaugh-Littig, Permit Supervisor

Re: Response to the United States Forest Service Concerns Regarding the Cottonwood/Wilberg Boundary Revision, PacifiCorp, Cottonwood/Wilberg Mine, ACT/015/019, Emery County, Utah. #2 Copy JAM

PacifiCorp, by and through its wholly-owned subsidiary, Energy West Mining Company ("Energy West") as mine operator, hereby responds to the concerns of the United States Forest Service (USFS) regarding the proposed Cottonwood/Wilberg Permit boundary revision.

In the letter dated February 23, 1998, the USFS refers to two (2) Federal leases contained within the Cottonwood/Wilberg Permit which are held by PacifiCorp; U-1358 (120 acres) and a portion of U-47978 (120 acres). PacifiCorp acknowledges these concerns of the USFS and responds accordingly.

In the Federal Coal Lease U-1358, subsidence has occurred which left large cracks and vertical offsets. PacifiCorp reclaimed the area in question as of September, 1997. The USFS contends that this area should remain in the permit until the reclamation/vegetation is determined to meet required standards set forth in R465-301-300. PacifiCorp, however, maintains that the area is already covered in the Deer Creek Mine Permit boundary and will receive the required monitoring until the area meets the reclamation standards of the Utah Coal Rules. This area need not be covered in two permits and, therefore, can be taken out of the Cottonwood/Wilberg Permit boundary.

The second concern the USFS mentions in the February 23 letter lies in a portion of Federal Coal Lease U-47978. There has been subsidence in the Newberry Canyon area which has caused visible cracks on top of the ridge. PacifiCorp determined the subsidence in this area is substantially complete, however, the USFS believes more

J:\PCCOMMON\PCCOMMON\ENVIRONM\PERMITS\CTWMINE\AMENDMNT\1998\PERBO598.LET

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 Program
Response to USFS Concerns
May 6, 1998
Page 2 of 2

monitoring of the area is needed. Therefore, PacifiCorp concedes to the request of the USFS and has decided to leave the area in the Cottonwood/Wilberg permit.

Revisions to the original amendment (**Amendment to Cottonwood/Wilberg Mine Permit for Permit Boundary Change** - January 15, 1998) which include the additional 120 acres in the Newberry Canyon area are as follows:

Pages:

Volume I, Chapter 1, page 1.1, Figure 1
Volume I, Chapter 1, page 8.1, Attachment B
Volume I, Chapter 1, pages 1-14 through 1-22
C1 Form

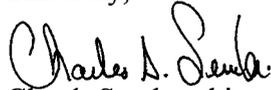
Maps:

Drawing CM-10370-WB, 1-3

Please exchange these pages with those pages of the original amendment. Seven copies of the revisions have been included with this submittal. The revisions are redlined to aid the review staff in examining what changes will occur.

If you have any questions or comments regarding this submittal, please feel free to contact Dennis Oakley at 435-687-4825.

Sincerely,



Chuck Semborski
Geology/Permitting Supervisor

CAS/DCO/dco

cc: Blake Webster w/encl (IMC)
Scott Child w/encl (IMC)
Carl Pallastro w/o encl (EWMC)
Chuck Semborski w/encl (EWMC)
Dennis Oakley w/encl (EWMC)
Barbara Adams w/encl (file)

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
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Title of Proposal: Amendment to Cottonwood/Wilberg Mine Permit for Permit Boundary Revision	Mine: COTTONWOOD/ WILBERG
	Permittee: PACIFICORP

Description, include reason for application and timing required to implement: To accurately determine permit acreage and DOGM request
Timing required - ASAP

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 checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	1. Change in the size of the Permit Area? <u>4360.62</u> acres Disturbed Area? _____ acres <input type="checkbox"/> increase <input checked="" 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 checked="" type="checkbox"/> Yes	<input 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 type="checkbox"/> Yes	<input checked="" 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?

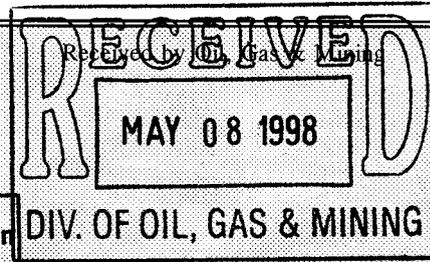
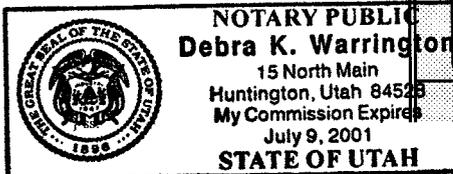
Attach 7 complete copies of the application.

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. (R645-301-123)

Charles A. Semborski Charles A. Semborski - Geology/Permitting Supervisor 5/6/98
Signed - Name - Position - Date

Subscribed and sworn to before me this 6th day of May, 19 98.

Debra K Warrington
Notary Public
My Commission Expires: 7-9 2001
Attest: STATE OF Utah
COUNTY OF Emery



ASSIGNED TRACKING NUMBER