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

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March 3, 1998

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

Re: Requirement to Correct Plan Deficiencies Associated with Highwall Elimination, PacifiCorp, Cottonwood/Wilberg Mine, ACT/015/019, Folder #3, Emery County, Utah

Dear Mr. Semborski:

During the last two years one of the main topics of oversite has been Highwall Elimination and Retention As a Part of Approximate Original Contour Restoration. The joint DOGM/OSM oversite team has evaluated this element under the primary oversight objective of determining whether minesite reclamation is successful. Surveys were sent to the mine operators asking for information on highwalls, Mine Plans were reviewed, field visits were conducted and an inventory compiled which identified those mine sites that had permit deficiencies associated with highwall reclamation.

In the highwalls inventory, the team found that 7 of the 35 mines (20 percent) in Utah have permit deficiencies relating to highwall reclamation . These deficiencies include (1) those situations where the permits show parts of post-May 3, 1978, highwalls that will be retained contrary to the requirements of Utah's program and (2) other situations where the permits are not clear as to what extent pre- and post- May 3, 1978, highwalls will be eliminated.

The Cottonwood/Wilberg Mine was one of those identified as having permit deficiencies. In order to resolve the deficiencies, you must revise your reclamation plan to address the elimination of highwalls as a function of Approximate Original Contour Restoration. It is suggested that you provide maps and cross sections of the highwall areas in enough detail to show how they will be reclaimed (cross sections perpendicular to the portal areas are recommended). The text also needs to discuss complete elimination for all post May 3, 1978 highwalls and elimination to the extent practical using all reasonably available spoil for pre May 3, 1978 highwalls. Enclosed is a copy of the Division's Directive on Approximate Original Contour Requirements which may aid you in preparing your response.

We have attempted to tie the schedule for correcting your plan to some other major permitting action that may be happening at the mine as well as trying to space out the reviews to accommodate DOGM's time frames. The schedule for the Cottonwood/Wilberg Mine was discussed with you and it was determined to correct the plan prior to the permit renewal. You are required to apply for permit renewal by no later than March 6, 1999, so you should provide the required amendment by no later than December 31, 1998.

If you have any questions, don't hesitate to call. We look forward to hearing from you.

Sincerely,

Daron R. Haddock
Permit Supervisor

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enclosure
cc: Jim Fulton, OSM, w/o
Mary Ann Wright, DOGM, w/o
Joe Helfrich, DOGM, w/o
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