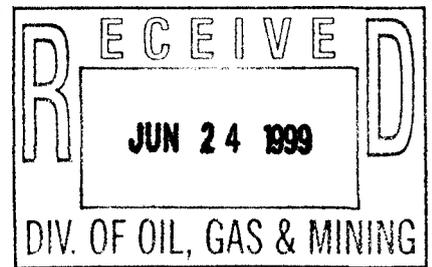


0023



June 18, 1999

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

ACT/015/019 #2
Copy Daron

Attn: Joe Helfrich

Re: Response to Deficiencies to the Miller Canyon Reclamation Plan, PacifiCorp, Cottonwood/Wilberg Mine, ACT/015/019, 99B, DOGM File #2, Emery County, Utah

PacifiCorp, by and through its wholly-owned subsidiary, Energy West Mining Company ("Energy West") as mine operator, hereby responds to the deficiencies received from the Division of Oil, Gas and Mining (DOGM) for the reclamation of the Miller Canyon portals of the Cottonwood Mine.

The format of this document will be DOGM's findings in **bolded** text, followed by Energy West's responses in *italics*.

- 1. The information provided by the applicant indicates that gravity flow still exists. The mine water discharge information does not draw conclusions to future discharge potentials at the portals. It is recommended that the applicant commit to conduct annual surveys of the portal area throughout the reclamation period to determine if mine discharge is continued or increasing. If any measurable flows appear the applicant should take samples to ensure acid and toxic contamination does not occur.**

PacifiCorp is currently required to monitor the discharge from Miller Canyon monthly as part of UPDES permit #UT-0022896-004. Monitoring will continue as it has in the past.

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Huntington Office:
(435) 687-9821
Fax (435) 687-2695
Purchasing Fax (435) 687-9092

Deer Creek Mine:
(435) 687-2317
Fax (435) 687-2285

Trail Mountain Mine:
(435) 748-2140
Fax (435) 748-5125

2. **The permittee must provide the following, prior to approval, in accordance with the requirements of :**

R64-301-223, R645-301-120 and R645-301-130, Please provide Attachment #2 and Attachment #3 as described on page 2 of the submittal and discussed above.

In 1995, PacifiCorp had soil analysis conducted on the soil piles as indicated in the reclamation plan. The plan did not state which analysis went with which soil pile. Analysis # CTW0195 is the analytical result of soil pile "B".

The location map of the soil piles at the Cottonwood/Wilberg waste rock site was inadvertently excluded from Attachment #2. The reclamation plan will be revised to include this map.

*An obvious error was found by the Division on page 2 of the reclamation plan, under **R645-301-200: Soils**. The plan states that the soil analysis report of the soil piles at the Cottonwood/Wilberg waste rock site can be found in Attachment #3. It should have stated Attachment #2. This error will be corrected. See attachments included at the end of this document.*

3. **The permittee must provide the following, prior to approval, in accordance with the requirements of :**

R645-301-231 and R645-301-120, Please provide a tally in tabular form of the remaining soil stockpiled at the Cottonwood/Wilberg waste rock site.

A table which outlines the volumes of available soil stored at the Cottonwood/Wilberg waste rock site before and after the Miller Canyon reclamation project will be included in Attachment #2 of the reclamation plan. See attachments included at the end of this document.

4. **The permittee must provide the following, prior to approval, in accordance with the requirements of:**

R645-301-355, Please add mulching to the reclamation steps described on page 3 of the submittal.

R645-301-354, Please indicate that seeding will be conducted again in late autumn.

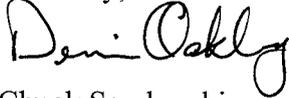
PacifiCorp commits to include mulch and netting to sufficiently cover the reclaimed area. Litter will be placed on top to keep the netting in place and also to control erosion. PacifiCorp also commits to conduct seeding again in late autumn. The seed mixture will be identical to the present mix.

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Response to Miller Canyon Project Deficiencies
Page 3 of 3

Attached are revised pages 2 and 3 and the required inserts for Attachment #2 for the Miller Canyon Reclamation Plan. Upon verbal approval seven (7) clean copies will immediately be submitted so this plan can be incorporated into the Cottonwood/Wilberg MRP.

Unless an unforeseen item has been neglected, all parameters to the Miller Canyon project deficiency response have been covered and are complete. If you have any questions please feel free to contact myself at 435-687-4720 or Dennis Oakley at 435-687-4825.

Sincerely,



for Chuck Semborski
Geology/Permitting Supervisor

DCO/dco/cas

Attachments Included

Cc: Blake Webster
Carl Pollastro
file