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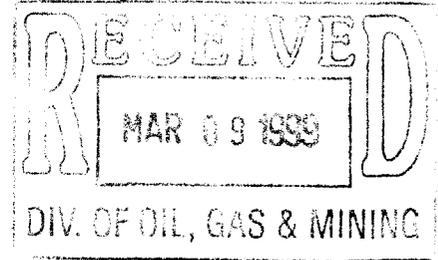
March 5, 1999

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

Attn: Pam Grubaugh-Littig

Re: Response to Phase I Bond Release for the Old Cottonwood/Wilberg Waste Rock Site, PacifiCorp, Cottonwood/Wilberg Mine, ACT/015/019-BR98-1, File #2, Emery County, Utah.

Copy Letter to Bob



PacifiCorp, by and through its wholly owned subsidiary, Energy West Mining Company ("Energy West") as mine operator, hereby submits a response regarding the Division findings to the Phase I bond release application for the old Cottonwood/Wilberg waste rock site (WRS). The original submittal, dated December 17, 1998, did not state the actual volumes of fill material covering the waste rock. The volumes of the WRS are given in the following responses.

Listed below are the Divisions *Findings* (Italics) and Energy West's **Response** (Bold) in regards to the Phase I submittal.

Engineering calculations and records should provide information needed to calculate and report the depths and volumes of soil excavated for use during reclamation. Excavated volumes need to be based on acreage and depth of excavation; likewise, replacement volumes need to be based on replacement depths and acreage.

The total excavated and cover volumes for the WRS has been calculated and can be reviewed in Appendix A. The total excavated volume of 106,915.6 cu. yds. was calculated using the cross-sections of the four As-Built drawings (KS1142E) originally submitted December 17, 1998. The area between the excavated line and the natural ground line represents the volume of excavated soil material.

Total cover volume was calculated by subtracting the calculated berm volume (Appendix A) from the excavated volume. The cover volume equals 79,859.6 cu. yds. Average cover depth throughout the WRS equals approximately 3.4 ft.

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As requested by Mr. Bob Davidson, Energy West took a sample core in cell 7. The depth of the core (approx. 3-ft.) was consistent with the average depth of the entire WRS. The location of the cored site is found in Appendix B.

Soil texture and type of material need to be provided for each sampling depth increment for identifying soil replacement depth and whether the material was soil or refuse.

Texture of the soils within the Cottonwood WRS were disclosed in the December 17, 1998 submittal (page 4, Discussion of Soil Analysis) and will again be reviewed. Attached in Appendix C are the soil sample analysis reports from the 1989 sampling exercise and include analysis from cells 2, 4, 5 and 6. Note that the majority of the soils in the waste rock area are of moderately coarse textured sandy loams from 0 – 3 feet in depth. All analysis found sandy loams between 0 and 1 foot. Cell 6 found sandy clay loams and clay loams between 2 and 5 feet in depth. The sample sites listed below detected coal at the reported depth interval:

Cell #	Sample Location*	Depth (ft.)
2	I	2
2	I	3
2	J	3
4	A	2
4	B	3
4	C	3
5	B	4
6	A	2

*Reference Appendix A in the December 17, 1998 submittal for the locations of the above sample sites.

All analyzed samples were of soil type material with the exception of the samples in the above table at their specified depth.

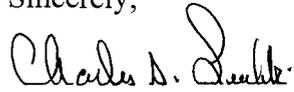
Based on the above research conducted by Energy West, all issues regarding the Division's findings have been explained to the fullest extent and/or are included in the following appendices. Three copies of this submittal are included for your inspection. If you have any questions or concerns, please contact Dennis Oakley at 435-687-4825.

Utah Coal Program

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Sincerely,



Chuck Semborski

Geology/Permitting Supervisor

Appendices Enclosed

DCO/dco/cas

Cc Blake Webster IMC (w/o appendices)
Carl Pollastro EWMC (w/o appendices)
Dennis Oakley EWMC (w/appendices)
file