



February 22, 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
Joe

Attn: Joe Helfrich

Re: Plan Response of Concerns, Highwall Elimination, PacifiCorp, Cottonwood/Wilberg Mine, ACT/015/019-98E, Folder #3, Emery County, Utah

PacifiCorp, by and through its wholly-owned subsidiary, Energy West Mining Company ("Energy West") as mine operator, hereby responds to the amendment concern regarding the December 18, 1998 review of the proposed Cottonwood Highwall Elimination Plan.

The concern regarding this plan examined the amount of fill to cover the highwall at least 1-foot above the coal seam. Soil settling had not been considered when organizing this plan. Although Utah Coal Regulations considers cover of at least 1 foot above coal seam as achieving minimum requirements, over time, the soil would subside and the coal seam would again be exposed. In order to resolve this problem, a 20% soil shrinkage factor will be used when estimating the fill depth of the highwall area.

The Division must realize, though, that some of the areas that will be filled are very narrow and will not allow for a 2:1 slope to be maintained. In these areas, the backfill will be compacted to the extent practical in order to minimize soil settling. The slope will be dependent on the height of the highwall and the allowable width to be filled.

The elimination plan has been amended to account for the concerns mention above. Seven (7) copies of redlined text of Appendix A are included with this submittal along with 7 clean copies. Appendix B is also amended to address the slope of backfill. Only clean copies of Appendix B are included since the software used to produce this appendix did not allow for strikeout/redlining.

If there is any questions or concerns regarding this submittal, please contact Dennis Oakley at 435-687-4825.

Huntington Office:
(435) 687-9821

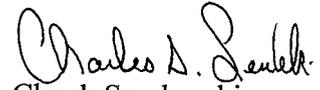
Fax (435) 687-2695
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Deer Creek Mine:
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Sincerely,



Chuck Semborski
Geology/Permitting Supervisor

DCO/dco/cas

Encl

Cc: Blake Webster IMC
Carl Pollastro EWMC
Dennis Oakley EWMC