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

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February 8, 1999

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

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

Dear Mr. Semborski:

The Division has completed the review of your December 18, 1998 submittal which provides supplemental information regarding the identification and elimination of highwalls found within the permit area. Randy Harden's technical analysis is provided. There is one deficiency that needs to be addressed. The analysis indicates that one foot of cover material is not sufficient to cover the highwall. Although it may meet the minimum design standards, it is unlikely that reclaimability and the performance standards can be met. Please address this deficiency by February 23, 1999.

TECHNICAL ANALYSIS:

RECLAMATION PLAN

BACKFILLING AND GRADING

Regulatory Reference: 30 CFR Sec. 785.15, 817.102, 817.107; R645-301-234, -301-537, -301-552, -301-553, -302-230, -302-231, -302-232, -302-233.

Analysis:

The proposal contains two drawings entitled, *COTTONWOOD MINE SURFACE FACILITIES MAP HIGHWALL SURVEY*, and, *COTTONWOOD MINE COTTONWOOD CANYON BREAKOUTS HIGHWALL SURVEY*. These two maps are used in conjunction with the revised text provided to identify pre- and post-SMCRA highwalls as defined by the May 3, 1978 ruling.

The proposal indicates that eighteen areas were identified and 7 of these areas are pre-SMCRA disturbances that are yet to be reclaimed.

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The maps show the general location, extent and the dates (as can best be determined) for the highwall areas associated with mine openings.

In general, the plans for the mine openings call for the installation of a concrete plug or seal within the mine portal. The Highwall areas will be backfilled to a nominal slope of 2:1.

Appendix B of the proposal is a photo essay of the extent of fill of highwalls. The photos provide an excellent pictorial description of the portal areas and approximate how fill material will be positioned during reclamation.

As noted in the photos, most of the mine openings are at the base of natural cliffs formed by competent sandstone overlying the coal seam. These natural cliff formations are not considered as part of the highwalls associated with the mine portals. The elimination of highwalls under these conditions only warrant that the portals are properly sealed and backfilled and that exposed coal seams are covered.

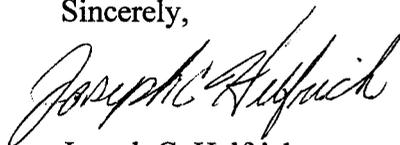
Information regarding closure of the mine openings and the elimination of highwall is considered satisfactory except that page A-2 states that, "...to cover the portal and highwall area to a depth of at least 1 foot above the coal seam..." While this comment meets the minimum requirements regarding covering exposed coal seams, the Division recommend that the amount of material covering any exposed coal seam be increased to four feet to help prevent combustion. A nominal cover of only 1 foot does not account for settling or erosion that is likely to occur.

Findings:

Information found in the proposal meets the minimum regulatory requirements for locating and identifying pre-and post-SMCRA highwall disturbances. The plan calls for the complete elimination, by backfilling, of all highwalls within the permit area.

If you have any questions please call Randy or me.

Sincerely,



Joseph C. Helfrich
Permit Supervisor

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cc: Ranvir Singh, OSM
Richard Manus, BLM
Janette Kaiser, USFS, 2 copies
Mark Page, Water Rights, w/o
Dave Ariotti, DEQ, w/o
Bill Bates, DWR, w/o
Price Field Office

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