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DIVISION OF
OIL, GAS AND MINING

June 30, 2000

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

Bond Release
Incoming

Re: Application for Phase I Bond Release for the Cottonwood Fan Portal Area, PacifiCorp, Cottonwood/Wilberg Mine, ACT/015/019, Emery County, Utah. B200D

PacifiCorp, by and through its wholly-owned subsidiary, Energy West Mining Company ("Energy West") as mine operator, hereby submits an application for Phase I bond release for the Cottonwood Fan Portal area. The said area, located in Section 25, Township 17 South, Range 6 East, has met the regulations of the R645 Utah Coal Rules in regards to Phase I bond release (R645-301-880.310). Much of the information within this bond release application is regenerated and/or referenced from the Cottonwood Fan Portal Reclamation Plan submitted in March of 1998. Please attain a copy of the approved reclamation plan when reviewing this application.

Introduction

The original development plans for the Wilberg Mine centered on extending the main entries westward to intersect the coal outcrop located in Cottonwood Canyon four miles west of the Grimes Wash portals.

It was anticipated that a ventilation exhaust fan would be needed in early 1983. However, with the breakouts for air intakes constructed in the Miller Canyon (reclaimed June, 1999 - Phase III Bond Release pending OSM findings) and the shift in mining emphasis to the South (Cottonwood) lease, the fan portal installation was postponed.

This portal site was initially disturbed under an exploration permit issued by the State of Utah for determining subsoil engineering design data for a major portal facility. This five acre site includes two small soil stockpiles, and a disturbed drainage collection system with two small sedimentation basins. Following updated plans and mining needs, the once proposed fan portal

Cottonwood/Wilberg Mine

Huntington Office:
(801) 687-9821
Fax (801) 687-2695

Deer Creek Mine:
(801) 381-2317
Fax (801) 381-2285

ACT/015/019

Cottonwood Mine:
(801) 748-2319
Fax (801) 748-2380

Purchasing Fax (801) 687-9092

was no longer required. Subsequently, final reclamation of the disturbed area was initiated and completed in November of 1998. Final reclamation on approximately half of the disturbed area was conducted in 1981. Refer to Drawing KS1710D in Attachment A for locations and dates of final reclamation.

There exists, within the area of reclamation, an old abandoned coal mine (Old Johnson Mine). Remnants include an old wagon road and two sealed portals. The roadway was upgraded and utilized during construction phases for facing off the proposed fan area and also during reclamation. This roadway was reclaimed, leaving only a trail to access the two portals, as part of reclamation operations.

Below the project area lies Cottonwood Creek and Emery County Road 506. The creek adjacent to the proposed fan portal is covered in a buried conduit to provide a working area for Trail Mountain Mine whose property lies west of said proposed Cottonwood Fan Portal site.

Requirements for Phase I Bond Release

Bond release for Phase I may be considered only after the Division is satisfied that all the reclamation requirements (taken from the Draft Policy for Bond Release Information) for Phase I have been met. The requirements are:

1. Completion of backfilling and regrading.
2. Completion of drainage control in accordance with the requirements of the approved reclamation plan.

Backfilling and Grading

Backfilling and grading procedures were conducted as planned and completed in November of 1998. The procedures consisted of placing a growth media from the stockpiled areas (topsoil and subsoil piles) on each of the five terraces and the access road to the Old Johnson Mine Site. The salvage material was first transported by 10 wheeled dump truck along the access road to a specific turn-around point located south of the Old Johnson portals. The material was distributed by track loader and placed and compacted at the designated terrace locations. The access road was backfilled in a similar manner. As the Draft Policy requires, drawings are included that show "as built" topography of the reclaimed site.

Drawing KS1699D (two drawings in Attachment B) illustrates cross-sectional views for the placement of soil on the reclaimed terraces. Quantity tables for the 5 terraces are also illustrated on drawing 1 of 2. Approximately 3121.7 cu. yds. of soil was used to fill terraces 1 through 4a to complete backfilling and grading activities. Drawing KS1729C (Appendix B)

illustrates cross-sectional views of the access road. The quantity table in this drawing shows approximately 351.24 cu. yds. of material was used to backfill this area. A total of 3472.96 cu. yds. of material was used to fill the cut slopes at the proposed Cottonwood fan portal area.

The top and sub soil piles were not placed sequentially. Both soil piles were used as fill material and consisted of similar physical and chemical characteristics. Soil specialists, Bob Davidson, examined these soil piles in a field visit on October 14, 1998. His report is attached as Attachment C. The topsoil pile was completely use and the area revegetated.

Drawing KS1710D in Attachment A illustrates the permit area boundaries associated with the proposed Phase I release site. This map also illustrates the proposed area for release, final reclamation topography, post reclamation hydrologic features, with dates of soil replacement.

Analysis of Fill Material

Six soil samples were collected (June, 1997) and analyzed (June, 1997) according to the methods outlined in the *Guidelines for Management of Topsoil and Overburden for Underground and Surface Coal Mines*. The samples were collected by a qualified Environmental Engineering staff member. One sample each (location CTW0597 and CTW0697) was taken from the subsoil and topsoil piles. Sample locations CTW0797 and CTW0897 characterizes the slope reclaimed in 1981. Sample location CTW0997 characterizes terrace 1 while sample location CTW1097 is a composite sample of terraces 2, 3, and 4A. All samples represent pre-reclamation conditions and were taken from 0 feet to 1 foot depth.. Analysis was provided for by Inter-Mountain Laboratories Inc. in Sheridan Wyoming. Sample locations are indicated on Drawing KS1710D in Attachment A. Raw laboratory analysis data can be found in Attachment D.

When evaluating the sample analysis report, note that all parameters analyzed rated as "Good" for a vegetative root zone when compared to the above mentioned guidelines. The pH values of all samples range from 7.6 to 7.9 units and shows a slightly basic soil. Electrical conductivity ranges from 0.51 mmhos/cm to 1.51 mmhos/cm. Sample CTW1097 is the only sample that analyzed above 1.0 mmhos/cm. Soils are typically ranked as non-saline for values below 2.0 mmhos/cm.

SAR values were found to be negligible. This reflects the minute contents of sodium, calcium and magnesium found in each of the samples. Selenium and Boron were also found to be negligible.

The texture of the sampled soils range between loam and silty loam. Silty loam soil textures were found on the stripped terraces where the topsoil had been removed.

Replacement depths are found on the Reclamation Slope Cross-Section Maps in Attachment B. Replacement depth varies between 0 and approximately 10 feet because of the gradient the soil was placed. The slopes were deep gouged at time of replacement to protect against erosion. Once vegetation is established, it will further protect against erosion. The north and south sediment basins remain in place to collect any runoff and reduce sediment loading to the Cottonwood Canyon Creek. Once vegetation is established, the sedimentation basins will be removed upon approval.

Drainage Controls

As part of final reclamation, two diversion ditches remain; Undisturbed Ditch 3 (UD-3) and Disturbed Ditch 4 (DD-4). Ditch UD-3 is located above the proposed fan portal disturbed area and directs runoff from the above undisturbed area to a natural drainage located along the southern boundary of the proposed fan portal area (refer to KS1710D in Attachment A). The ditch was designed to carry a capacity for a 10 year/6 hour storm event with a flow of 2.8 cfs. The maximum slope of UD-3 is 0.20 ft/ft with a bottom width of 3 feet and channel depth of 1 foot. Riprap was sized with a minimum safety factor of 1.5.

DD-4 is located below terrace 1. This ditch diverts all runoff from the disturbed area above the ditch to the south sediment pond. Ditch DD-4 was also designed to carry a flow capacity for a 10 year/6 hour storm event of 0.7 cfs. The maximum slope of DD-4 is 0.11 ft/ft with a bottom width and depth of 1 foot.

A french drain system was also designed and incorporated into final reclamation to direct groundwater flow to the surface, protecting against slope failure of a saturated fill. The source of the groundwater is from the winter snowpack which melts and infiltrates the lower Blackhawk Formation (refer to Volume 8, Geologic Section, Cottonwood/Wilberg, Des-Bee-Dove, Deer Creek Mines) through vertical fractures. The groundwater flows down vertically until it intersects mudstone layers above and below the Hiawatha seam. Groundwater flow continues horizontally downdip through the permeable sandstone channel located above the Hiawatha seam until it intersects the land surface in the form of seeps. Flow from the seeps is insufficient for the quantity and quality determination. Construction of the french drain consisted of a layer of 2" drain rock to a depth of 6" to cover the affected area. A filter fabric was placed over the drain rock to prevent contamination of the drain system. Five french drain systems were installed within the reclaimed proposed fan portal area. Refer to Drawing KS1710D in Attachment A for their locations.

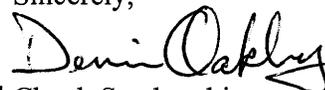
The information included with this bond release is a requirement of the *Draft Policy for Bond Release Information*. This draft policy was acquired from the Division of Oil, Gas and Mining and used with the idea that the *draft* document would become a *final* document in the near future. The information submitted includes:

- Attachment A; Drawing KS1710D which illustrates 1) reclaimed area proposed for bond release, 2) dates of reclamation, 3) final reclamation topography, 4) post-reclamation hydrologic features, and 5) soil sampling locations
- Attachment B; Drawing KS1715D, Topsoil and Subsoil Cross-Sections
- Attachment C; Division technical field visit report
- Attachment D; Soil sampling laboratory analysis report
- Attachment E; Notice Letters to entities outlined in R645-301-880.120 and draft public notice advertisement

PacifiCorp requests that the fractional bond amount held on the Cottonwood Fan Portal area be reduced 60% as stated in R645-301-880.300. This would reduce the bond liability amount by \$52,682.40. This leaves a total bond liability amount of \$1,415,865.00. At present, the reclamation bond for the Cottonwood/Wilberg Mine is \$2,071,098.00. At the completion of Phase II reclamation, PacifiCorp will request that the remainder of the bond be reduced for this area.

All information that is submitted with this application for Phase I Bond Release is accurate and complete to the best of our knowledge. Three copies of this application is included with this submittal. If you have any questions or concerns regarding this application, please feel free to contact Dennis Oakley at (435) 687-4825.

Sincerely,


for Chuck Semborski
Environmental/Geology Supervisor

Enclosures

DCO/dco/cas

Cc: Carl Pollastro, EWMC, w/o Attachments
Scott Child, IMC, w/o Attachments
Bill Malencik, DOGM - Price Field Office, with Attachments
File

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