



August 4, 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

**RECEIVED**

AUG 10 2000

DIVISION OF  
**OIL, GAS AND MINING**

Attention: Permit Supervisor

Re: Response to Deficiencies to Reclamation Plan, PacifiCorp, Cottonwood/Wilberg Mine, ACT/015/019-AM00B

*ENCLOSING*

PacifiCorp, by and through its wholly owned subsidiary, Energy West Mining Company (“Energy West”) as mine operator, submits a response to deficiencies to amendment AM00B and to update labor rates, equipment rental rates, and indirect costs associated with the bond calculation in the reclamation plan. The deficiencies pertain to the Earthwork calculations within the Reclamation Plan.

**LABOR RATES**

Labor rates for all aspects of the bond calculation have been updated using either Davis-Bacon wage rates for the Carbon/Emery county area, MEANS (2000) labor rates for Utah, or “Blue Book” labor rates provided by DOGM through Wayne Western. The lowest rate from these three sources was used. A copy of the Davis-Bacon wage rates, a spreadsheet identifying the labor rates, and the rates used are enclosed with this submittal.

**EQUIPMENT RENTAL RATES**

Equipment rental rates for all aspects of the bond calculation have been updated using rates from MEANS (2000) or “Blue Book” rates provided by DOGM through Wayne Western. A spreadsheet identifying the equipment rental rates and the rates used is enclosed. The lowest equipment rental rate was used.

**INDIRECT COSTS**

Indirect costs for bond calculations have been updated utilizing the guidelines in the U. S. Department of the Interior, Office of Surface Mining, HANDBOOK for Calculation of Reclamation Bond Amounts.

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

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

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

## DEFICIENCY

### *Findings:*

*The information provided in the bond calculations is not considered adequate to meet the requirements of this section. Prior to approval, the Permittee must provide the following in accordance with:*

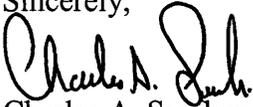
*R645-301-830.140, The Permittee must give the Division detailed earthwork calculations. Those calculations must show the cut and fill quantities and the supporting information. The Permittee must give detailed material balance information that included the areas where material will be cut and sent for fill.*

## RESPONSE

The information in the bond calculations does now agree with the cut and fill quantities given on Plates CW-10500-WB and CW-10378-WB. Nomenclature in the bond calculations also agrees with the locations identified on Plates CW-10500-WB and CW-10378-WB. Plates CW-10500-WB and CW-10378-WB indicate that a 1,927 CY fill shortage will be supplemented with asphalt/concrete. Demolition calculations indicate that 2,014 CY of material will be available for this purpose, with an excess of 87 CY to be distributed within the reclaimed area.

Four copies of the response to deficiencies with updated cost figures are enclosed for your review and comment. Upon approval of the amendment, please return a stamped clean copy. If you have any questions, please contact me at (435) 687-4720 or Bob Willey at (435) 687-4722.

Sincerely,



Charles A. Semborski  
Geology/Environmental Supervisor