



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

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October 27, 2000

Chuck Semborski, Environmental Supervisor
 Energy West Mining Company
 P.O.Box 310
 Huntington, UT 84528

Re: Permit to Revise Alternative Sediment Control areas (ASCA) - Final Reclamation of
 Miller Canyon and 9th East Portals, PacifiCorp, Cottonwood/Wilberg Mine, A [REDACTED]
 - AM00C *OUTGOING FILE*

Dear Mr. Semborski:

The above-referenced amendment has been reviewed and there are deficiencies that must be adequately addressed prior to approval. A copy of our technical analysis is enclosed for your information. I apologize for the delay in reviewing this amendment. Please respond to these deficiencies by January 25, 2001, or the Division will return your application.

If you have any questions, please call me at (801) 538-5258 or Mike Suflita at (801) 538-5259.

Sincerely,

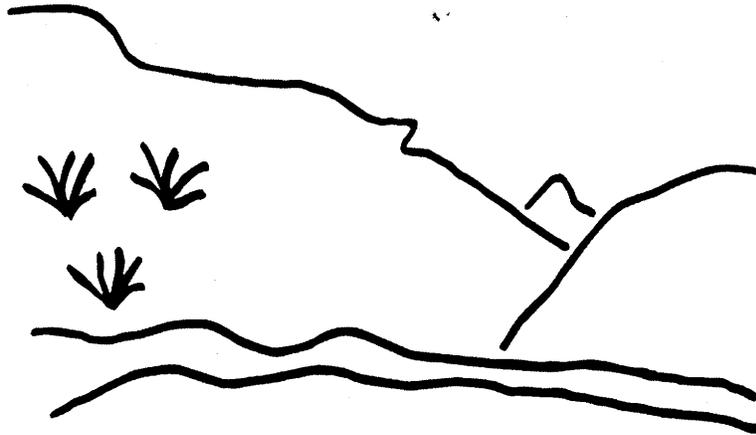
Susan M. White
 Acting Permit Supervisor

gag/sm

Enclosure:

cc: Price Field Office
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State of Utah



Utah Oil Gas and Mining

Coal Regulatory Program

Cottonwood/ Wilberg
Permit to Revise Alternative Sediment Control areas (ASCA)
ACT/015/019 - AM00C
Technical Analysis
October 25, 2000

INTRODUCTION

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On February 4, 2000 the Division received an amendment submitting three replacements / revisions to the Operational Plan of the Cottonwood MRP. As submitted, the replacements include a revision of Table 5.1 ALTERNATIVE SEDIMENT CONTROL AREAS, replacing Map 1-3 (CM-10370-WB), and replacing Map 3-16 (WS449E). This Technical Analysis is a review of the table and maps submitted. Outlined below are the technical deficiencies observed in the review of the amendment.

INTRODUCTION

OPERATION PLAN

OPERATION PLAN

HYDROLOGIC INFORMATION

Regulatory Reference: 30 CFR Sec. 773.17, 774.13, 784.14, 784.16, 784.29, 817.41, 817.42, 817.43, 817.45, 817.49, 817.56, 817.57; R645-300-140, -300-141, -300-142, -300-143, -300-144, -300-145, -300-146, -300-147, -300-147, -300-148, -301-512, -301-514, -301-521, -301-531, -301-532, -301-533, -301-536, -301-542, -301-720, -301-731, -301-732, -301-733, -301-742, -301-743, -301-750, -301-761, -301-764.

Analysis:

Sediment Control Measures

The revision of **Table 5.1** helps clarify and update current activities. Acreage variances observed from the previous Table 5.1 (Waste Rock Site UTU-37642 and Wilberg Fan) were explained by the operator as a combination of calculating differences within the drafting software, and a more precise outline of the disturbed areas. However, the following inconsistencies exist between the original Table 5.1 ALTERNATIVE SEDIMENT CONTROL AREA and the proposed revision:

- ▶ The Cottonwood Canyon Fan Portal: Areas 3-7 shows 8.1 acres of disturbance while the referenced drawing CM-10501-CP indicates 8.4 acres.
- ▶ The Miller Canyon and DC 9th East Breakout, although reclaimed, need to be included and indicate the current sediment control treatment.

The replacement drawing Map 1-3 CM-10370-WB Cottonwood/Wilberg Coal Mine Permit Areas, is a significant improvement in quality to the current map. The map currently in the MRP is a copy compared to the replacement original. Changes from the drawing currently in the MRP include clarity and better defined Waste Rock Storage Sites (UTU-65027 and U-37642).

Drawing Map 1-16 WS449E, which was referenced in the Amendment cover letter as being submitted, was not submitted. The submitted drawing, labeled Map 3-16 (WS449D), does reflect completion of the 9th East reclamation. Drawing Map 3-16 (WS449D) illustrates a 6-inch sewer line that exists outside the Disturbed Area Boundary. The 6-inch sewer line in question is located due south of the North Pond. The Disturbed Area map needs to be revised to include the sewer line within the Disturbed Area. The markers defining the disturbed area at the mine site need to be adjusted, if necessary to include the sewer line. Map 3-16 (WS449E) needs to be submitted, or Table 5.1 needs to be changed to reference Map 3-16 (WS449D).

Findings:

In its present form the application does not meet regulatory requirements. The Applicant must address the deficiencies listed within this Technical Memo in accordance with the requirements of:

R645-300-133.100 1) Resolve the acreage differences described above. 2) Include Miller Canyon and DC 9th East Breakout in Table 5.1.

R645-301-121.200 1) Resolve the discrepancy in designation of Map 3-16 (WS449D) in Table 5-1 and in the correspondence. 2) Modify Map 3-16 (WS449D) to illustrate 6-inch sewer line existing within the Disturbed Area Boundary.

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