

JUN 27 2001

DIVISION OF
OIL, GAS AND MINING

PO Box 310
Huntington, Utah 84528

June 25, 2001

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, Permit Supervisor

RE: **Response to Deficiencies to Volume 2, Part 4 of Reclamation Plan, PacifiCorp, Cottonwood/Wilberg Mine, C/015/019-AM00B2, Emery County, Utah**

PacifiCorp, by and through its wholly-owned subsidiary, Energy West Mining Company ("Energy West") as mine operator, hereby submits a response to the deficiencies of the Cottonwood/Wilberg Mine Reclamation Plan received November 14, 2000.

These deficiencies were to be responded to by January 24, 2001, but because reclamation maps had to be redrawn showing new cross-sections and redefined final contours, a 60 day extension was requested. On April 24, 2001, another extension was requested to complete the continuing work on the surety bond of the mine.

Attached are the deficiencies from AM00B2 in the order they were received. Also attached are the redline/strikeout pages which will be amended in the Cottonwood/Wilberg MRP. The bond computation pages (placed in Volume 2, Part 4, Appendix C) were not redlined. This appendix was completely redone in order to satisfy Division deficiencies.

Note that all new bond calculations were figured in 2000 dollars. Other bond calculations that were not at issue (i.e., Cottonwood Canyon Fan Portal Area, Cottonwood/Wilberg Waste Rock Site) are shown as originally calculated and then inflated to 2000 dollars.

Energy West has provided four (4) each of the following for your review:

★ **Volume 1, Table of Contents**

Revisions

- Revised entire TOC for page number adjustment and deficiency items.
Redline/strikeout copy submitted, replace entire section.

Huntington Office:
(435) 687-9821

Fax (435) 687-2695

Purchasing Fax (435) 687-9092

Deer Creek Mine:
(435) 687-2317

Fax (435) 687-2285

Trail Mountain Mine:
(435) 748-2140

Fax (435) 748-5125

★ **Volume 2, Part 4**

Revisions

- Revised text to follow proposed reclamation procedures and bond estimation items (Items 1-14). Redline/strikeout copy submitted, replace entire section.

★ **Volume 2, Part 4, Appendix C**

- Revised entire section to comply with technical analysis. This section has no redline/strikeout, replace entire section.

★ **Volume 2, Part 4, Appendix D**

- Added new data from soil sampling program conducted in 2001.

★ **Volume 10, page 3-16 & page 3-20**

Revisions

- Revised bond summary (pg 3-16) to include riprapped channel construction. Removed text associated with extending a ditch 230 feet.
- Replaced bond estimation for extending a ditch 230 feet with a bond estimate to construct a 660 foot riprapped channel.

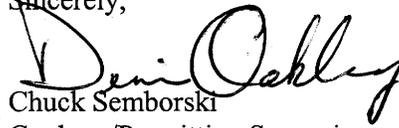
★ **Maps**

- Plate 4-1: Converted to AutoCAD, revised cross-sections, mass balance table, final contours.
- Plate 4-2 (1 of 3 & 2 of 3, & 3 of 3): Converted to AutoCAD, revised cross-sections, mass balance table, final contours.
- Plate 4-3: Converted to AutoCAD, revised cross-sections

Also included with this submittal as requested by the Division are all 9 plates of Appendix Volume, Appendix III associated with the overland tube. One (1) copy is attached to incorporate into your MRP. These plates were approved for incorporation into the MRP in the early 90's. During a side by side inspection conducted last year between the Division and Energy West, it was found that these plates were not included in the Division's copy of the Cottonwood/Wilberg MRP.

If you have any questions or concerns with this submittal, please feel free to contact me at (435) 687-4720 or Dennis Oakley at (435) 687-4825.

Sincerely,

for

Chuck Semborski
Geology/Permitting Supervisor

DCO/dco

cc Carl Pollastro
file

APPLICATION FOR PERMIT PROCESSING

<input checked="" type="checkbox"/> Permit Change	<input type="checkbox"/> New Permit	<input type="checkbox"/> Renewal	<input type="checkbox"/> Transfer	<input type="checkbox"/> Exploration	<input type="checkbox"/> Bond Release	Permit Number: C/015/019
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Title of Proposal: Response to Deficiencies to Volume 2 Part 4 of the Reclamation Plan, PacifiCorp, Cottonwood/Wilberg Mine, C015/019-AM00B2, Emery County, Utah	Mine: Cottonwood/Wilberg Mine Permittee: PacifiCorp
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Description, include reason for application and timing required to implement:

Instructions: If you answer yes to any of the first 8 questions (gray), this may be a Significant Revision and require Public Notice. Any questions, please call a Permit Supervisor.

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	1. Change in the size of the Permit Area? _____ acres Disturbed Area? _____ acres <input type="checkbox"/> increase <input type="checkbox"/> decrease.
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	2. Is the application submitted as a result of a Division Order? DO # _____
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	3. Does application include operations outside a previously identified Cumulative Hydrologic Impact Area?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	4. Does application include operations in hydrologic basins other than as currently approved?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	5. Does application result from cancellation, reduction or increase of insurance or reclamation bond?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	6. Does the application require or include public notice/publication?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	7. Does the application require or include ownership, control, right-of-entry, or compliance information?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	8. Is proposed activity within 100 feet of a public road or cemetery or 300 feet of an occupied dwelling?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	9. Is the application submitted as a result of a Violation? NOV # _____
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	10. Is the application submitted as a result of other laws or regulations or policies? Explain: _____
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	11. Does the application affect the surface landowner or change the post mining land use?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	12. Does the application require or include underground design or mine sequence and timing? (Modification of R2P2?)
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	13. Does the application require or include collection and reporting of any baseline information?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	14. Could the application have any effect on wildlife or vegetation outside the current disturbed area?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	15. Does application require or include soil removal, storage or placement?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	16. Does the application require or include vegetation monitoring, removal or revegetation activities?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	17. Does the application require or include construction, modification, or removal of surface facilities?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	18. Does the application require or include water monitoring, sediment or drainage control measures?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	19. Does the application require or include certified designs, maps, or calculations?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	20. Does the application require or include subsidence control or monitoring?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	21. Have reclamation costs for bonding been provided for?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	22. Does application involve a perennial stream, a stream buffer zone or discharges to a stream?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	23. Does the application affect permits issued by other agencies or permits issued to other entities?

Attach 4 complete copies of the application.

I hereby certify that I am a responsible official of the applicant and that the information contained in this application is true and correct to the best of my information and belief in all respects with the laws of Utah in reference to commitments, undertakings, and obligations, herein.

Charles A. Semborski Geology/Permitting Supervisor
 Signed - Name - Position - Date
Charles A. Semborski Environmental Engineer

Subscribed and sworn to before me this 25 day of June, 2001.

Lori Ann Anderson
 Notary Public
 My Commission Expires: 12/22, 2001
 Attest: STATE OF Utah COUNTY OF Emery

Received by Oil, Gas & Mining
ASSIGNED TRACKING NUMBER

