



United States Department of the Interior

SEP 04 2001

BUREAU OF LAND MANAGEMENT

DIVISION OF
OIL, GAS AND MINING

Price Field Office
125 South 600 West
Price, Utah 84501

3482
SL-064900
(UT-070)

TE-DB-1

Pamela Grubaugh-Littig
Permit Supervisor
Utah Division of Oil, Gas and Mining
1594 West North Temple Street
Salt Lake City, Utah 84114-5801

AUG 30 2001

Re: Temporary Closure, Cottonwood/Wilberg Mines, PacifiCorp

Dear Mrs. Grubaugh-Littig:

Enclosed is a copy of two inspection reports of joint onsites at the subject mines conducted by field personnel from both our agencies. The report was to document findings at the said mine during temporary closure. Along with these reports are our recommendations on the closure plan received from the company.

Copy to Person
Smith

PacifiCorp, through its wholly owned subsidiary Energy West, Inc., sent a notice to us on February 8, 2001, of "Temporary Cessation of Operations for the Trail Mountain, Cottonwood and Wilberg Mines". We have previously commented on the Trail Mountain Mine portion of the cessation plan. An underground inspection of the Cottonwood/Wilberg Mine was held which we could not attend. However, we have visited the mine portal areas and participated in the underground inspection of the area to be sealed in the Deer Creek/ Wilberg shaft area. The Deer Creek/Wilberg shaft area was inspected from the Deer Creek Mine, as the company had to seal the 1st South Mains as access to the top of the shaft. This was far more practical than trying to seal at the shaft. These two inspection reports are enclosed. The inspections verify the closure plan and support our findings for the proposed cessation plan.

The application for "Temporary Cessation of Operations" submitted by PacifiCorp details the plans for putting the Cottonwood/Wilberg Mine in a temporarily closed condition with temporary portal seals and documents what items will be left in the mine. Most of the items to be left are belt structure, power cable and pipe. Should the mine be re-opened much of these items will be used or replaced. Should the mine never re-open and reclamation occurs, these items of themselves should not cause any impacts to the hydrologic regime in the mine. These items are inert metals with no liquids or oils. No other items potentially hazardous or toxic were noted during the inspection. We therefore have no objections to leaving the listed items underground should the mine never be opened again.

With regard to temporary sealing of the portals, the plan is adequate to protect the unmined coal resource and bar access to the resource. The seals meet standards set by MSHA and are acceptable to us for compliance with rules under the Mineral Leasing Act for abandonment and protection of the unmined coal and other mineral resource (43 CFR 3484.2 (b)).

Pursuant to the Mineral Leasing Act of 1920, as amended, and in conjunction with the rules at 43 CFR 3400, and the lease terms, PacifiCorp's plan for temporary abandonment of the Cottonwood/Wilberg Mine is acceptable and confirmed by us. Should you have further questions, please contact Stephen Falk of my staff at (435) 636-3600.

Sincerely,



for Richard L. Manus
Field Manager

Enclosure

Inspection Reports (2)

cc: UT-921, SD, Utah (w/enclosure)
Manti-LaSal National Forest (w/enclosure)
599 West Price River Road
Price, Utah 84501
Energy West Mining Company (w/enclosure)
P. O. Box 310
Huntington, Utah 84528
Utah Division of Oil, Gas and Mining (w/enclosure)
Price Field Office
451 East 400 North
Price, Utah 84501

Bureau of Land Management
Inspection Report For Coal Operations

Inspection Number swf06/20/01

Thursday, August 09, 2001

Inspection Date 6/20/01

Quarter 3rd

Fiscal Year FY2001

Mine Cottonwood

Purpose Special

SL-064900
U-044025

Lead lease
Portal location

*Opening
6/15/01
Copy to:
Jim Smith*

Current Mine Status

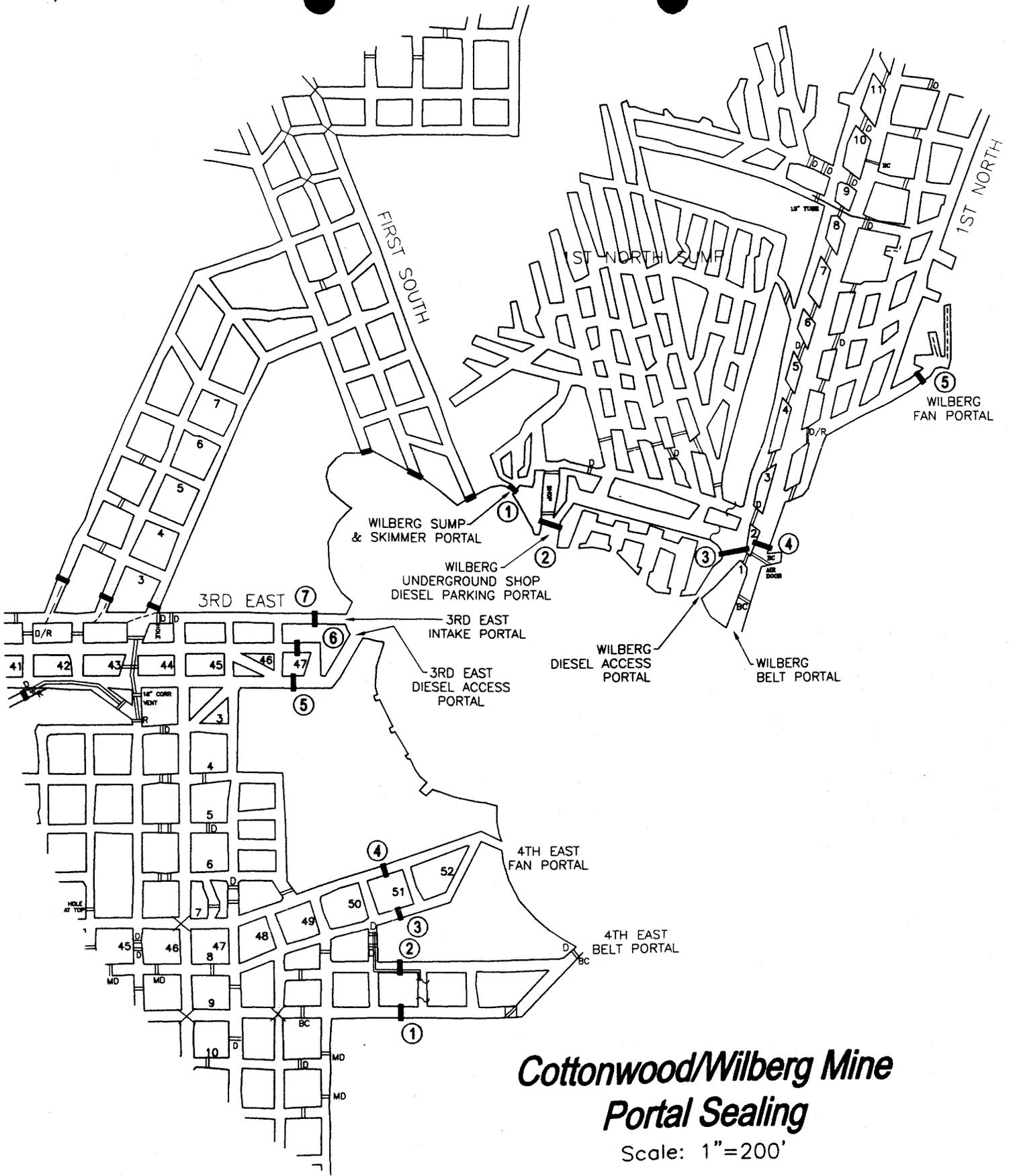
On June 20, 2001, I (Stephen Falk) and Sue Burger (summer intern) inspected the erected temporary seals at the Cottonwood/Wilberg Mine portal area. Seth McCourt was our company representative. The purpose of the inspection was to verify the temporary seals erected by Energy West at all the portals at the Cottonwood/Wilberg surface facilities.

On February 8, 2001, BLM received from Energy West a notice for "Temporary cessation of operations for the Trail Mountain, Cottonwood, and Wilberg Mines". In short summary, the Trail Mountain Mine had finished longwall mining of the reserves on the Trail Mountain property. Coal was conveyed via an enclosed conveyor belt across Cottonwood Canyon from the Trail Mountain portals to the Cottonwood belt portals and conveyed through the Cottonwood Mine to the Cottonwood/Wilberg loadout facilities in Grimes Wash. This was used for many years to allow the use of the same loadout facilities and the ability to ship triple coal haul truck trailers down the existing Wilberg haul road to the Hunter Power Plant. With the cessation of coal production at Trail Mountain, Energy West has opted to idle the operations and in so doing to construct temporary seals over all portals. Also the plan noted items to be left underground. Two underground inspections with Utah Division of Oil Gas and Mining personnel were held with company officials, one for Trail Mountain and one for Cottonwood/Wilberg. BLM attended the Trail Mountain inspection but were not able to attend the Cottonwood/Wilberg inspection. This inspection (June 20, 2001) was to note the seals that had been erected after the final underground inspection.

There are 12 portals at this complex. Three portals have been sealed since the Wilberg fire in 1984 (First South intakes). We checked the rest of the portal seals. From the east to the west, we first saw the Wilberg Fan portal which has the fan taken away and a block seal back behind the blast-proof fan housing. Around the corner were the Wilberg belt and roadway portals. Both were blocked sealed back 100 feet from the opening and the opening fenced off at the direct opening. The sump and shop portals next to the underground office were both blocked at the opening. At the 3rd East intake portal pad, the two portals were open with fence at the opening. Seals were 200 feet inby with three seals. 4th East fan portal had the fan housing sealed at the explosion doors. And last, the 4th East belt entry was fenced and block sealed 200 feet inby. These seals meet temporary closure standards for protection of the coal resource. One suggestion was given to Energy West was to fence off the tunnel access opening for the 3rd East pad. Energy West has plans for remote cameras for site security as the gate down the haul road does not have fencing on either side of the gate.

Close Out Discussion

The seals and fencing used on the portals meets the requirements for resource protection under a temporary closure of the mine. The items listed that would be left in the mine, we believe do not have any known substances that would be considered hazardous or would pose a problem to hydrologic resources. We have no objections to things to be left in the mine.



Bureau of Land Management
Inspection Report For Coal Operations

Inspection Number swf051501

Monday, July 23, 2001

Inspection Date 5/15/01

Quarter 3rd **Fiscal Year** FY2001

Mine Deer Creek **Purpose** Special

Interwest
7/15/01
Copy to
Interwest

Current Mine Status

On May 15, 2001, I along with Steve Demczak, Reclamation Specialist with Utah Division of Oil Gas and Mining (UDOGM), inspected portions of the Deer Creek Mine. Louie Tonc, Mine Engineer for Energy West was our company representative. The purpose of the inspection was to verify areas of the mine that will be sealed for hazardous materials and any equipment left and documented.

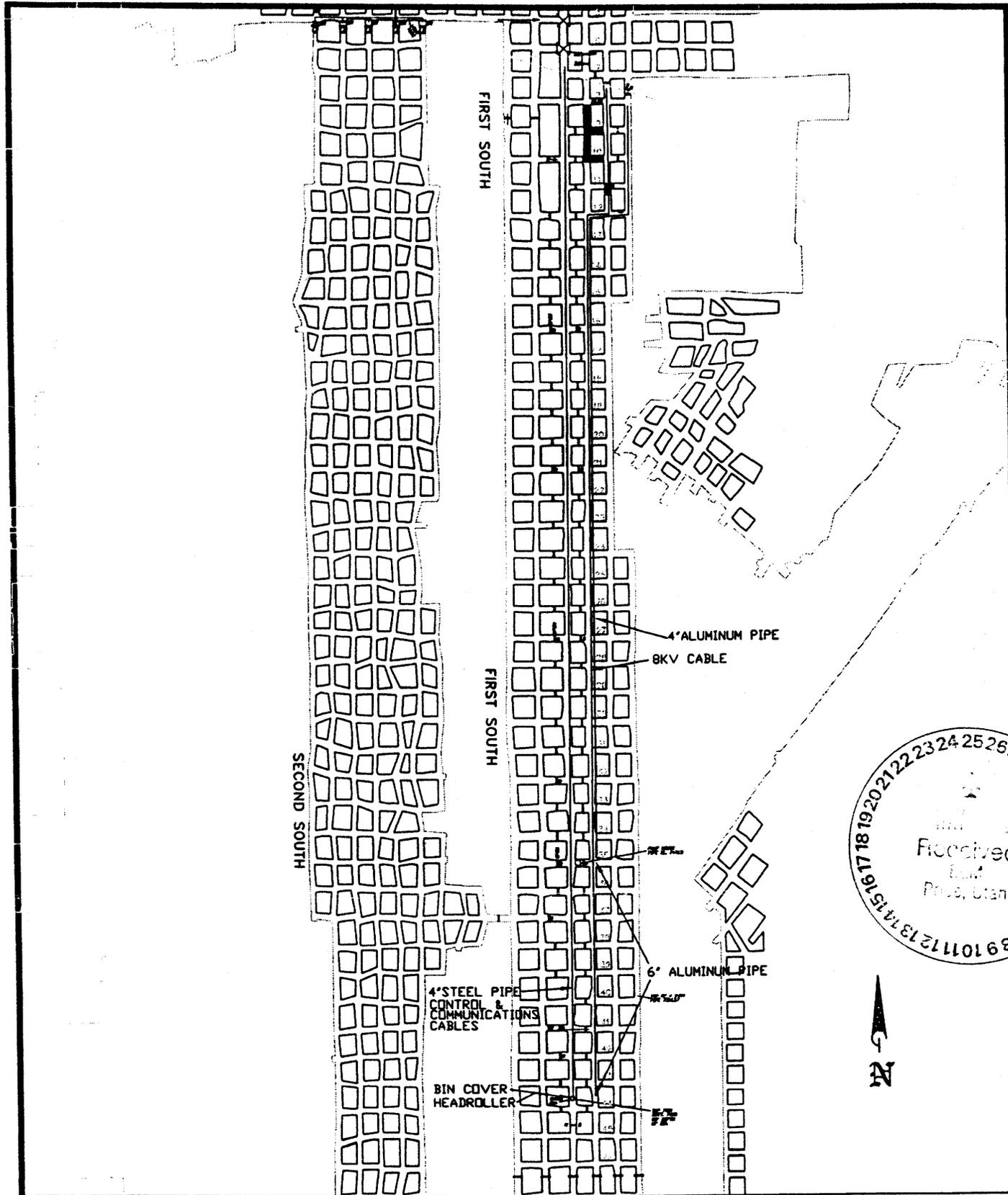
The First South Mains in the Deer Creek Mine were used for the last 10 years for transfer coal down a shaft to the Wilberg Mine. In sealing up the Wilberg portal, the connection from Wilberg to Deer Creek would have to be sealed somewhere to assure complete separation of sealed areas with areas still ventilated. Energy West needed to seal the the Deer Creek Mine working off from the Wilberg mine through the shaft. Energy West concluded that the best way was to block off the head of the entries leading to the shaft in Deer Creek which would be more cost effective than trying to seal at the shaft. The shaft and bunker were not designed for a continuous coal stream so the extra production at Deer Creek would be less expensive to truck to Hunter Power Plant than to send coal down through the shaft and out Cottonwood portal. Interwest would not have good control of the amount going through as they could not stockpile anywhere plus the expense of keeping the belt line open and running increases labor cost considerably.

The seals are planned for just inby the intersection of First South and Main West. We walked down the beltline to the shaft station. All belt structure was removed. At the shaft, the metal structure for the bin at the top of the shaft along with the head roller into the bin, were to be left. These items are just pieces of steel. Down the belt entry, an old 4" steel pipe and small communication cables were left. We travelled back along the adjacent intake (old track entry) and noted a 4" aluminum pipe left. A pump and motor left were to be pick up. These items we observed, Interwest documented to be left. No other items of consequence were noted to be left. The items were all metal with no liquids or oils involved.

The seals were starting to be constructed and the methodology is satisfactory from our standpoint to isolate the area and cut off air to the worked out section. The remaining items were non-toxic and inert metal. We have no concerns with these items to be left in this sealed area.

Close Out Discussion

We expressed our initial opinion to Interwest that the items to be left were not a concern but that the regulatory management would evaluate the situation based on Interwest's permit submittal and this report.



DEER CREEK MINE 1ST SOUTH
 ABANDON MATERIALS MAP 5/22/01
 SCALE: 1" = 500'