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DIVISION OF
OIL, GAS AND MININGPO Box 310
Huntington, Utah 84528

April 25, 2002

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

Dennis
4/15/02
AM00A

**Re: Deficiency Responses to Amendment C/015/019-AM00A-1, PacifiCorp,
 Cottonwood/Wilberg Mine, C/015/019, Emery County, Utah**

PacifiCorp, by and through its wholly-owned subsidiary, Energy West Mining Company ("Energy West") as mine operator, hereby responds to the deficiencies received from the Division of Oil, Gas and Mining (DOG M) for reducing the permit area and adjusting the permit boundary as defined by the BLM right-of-way 65027.

The attached document attempts to answer the deficiencies in the order they were received. The Division's findings will be first listed by regulation and explanation. Energy West will follow by a response in *italics*.

Accompanying this letter and deficiency responses are four (4) redline/strike and seven (7) clean copies of Attachment F in Appendix VII. C1/C2 forms are also included. Hopefully, the changes made to Appendix VII will expedite the approval process for C/015/019-AM00A-1. If there are any questions concerning this submittal please contact Dennis Oakley at (435) 687-4825 or myself at (435) 687-4720.

Sincerely

A handwritten signature in cursive script that reads "Charles A. Semborski".

Chuck Semborski
 Geology/Permitting Supervisor

cc: Carl Pollastro
 File

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

The following responses to deficiencies are formatted as found in the technical analysis document. They are broken down into logical section headings similar to the R645 regulations. In each section, the regulation number along with the associated deficiency is followed by the permittee's italicized response.

OPERATION PLAN

Spoil and Waste Materials

R645-301-553.252, Attachment F needs to be labeled to show it is a comparison of 1986/9 combined data and 1994 data.

Typographic errors in the raw data have been amended to reflect correct parameter values. The raw data from 1989 has been removed from the comparison. The charts have also been updated showing this change.

R645-301-553.252, The locations of sampling areas discussed as "problem areas" of Cell 2 and "patchy areas" of Cell 5 in Attachment C; (6) should be shown in the application, probably in Figure 2 of Appendix VII.

The vegetation monitoring was reported by Dr. Patrick Collins of Mt. Nebo Scientific and is included in Attachment C of Appendix VII. His report suggests that there are portions of Cell 2 that may have problems due to sodium or other soil problems. This area he called Cell 2 (Problem Area), refer to photographs in Attachment C. The Cell 2 (Problem Area) is compared to a control area which is denoted Cell 2 (Control). This area is also referenced in the photographs of Attachment C.

Cell 5 is reported to have "patchy areas" of vegetation growth of approximately 10-15% of the cell area. This area is not delineated within the report, however, these areas only consist of approximately 1/4 to 1/3 acre total. It would now be impossible to delineate the "patchy areas" since the report was completed in 1997.

R645-301-553.252, The statement that 3.4 feet of soil was placed over the site is not supported by the laboratory data and should be field verified and changed if necessary. If field verification confirms that 3.4 feet of soil is present, the text should mention that this verification was done and that either the lab sheets are in error or that some parts of the site may have less soil cover.

At the time of the first submittal of the Phase I Bond Release application for the Cottonwood Waste Rock Site, Soils Reclamation Specialist Bob Davidson questioned the amount of cover placed over the cells in a deficiency letter to the Phase I Bond Release Application dated March 1, 1999 (and attached memo dated February 9, 1999). The MRP indicates that sufficient subsoil material and 12" of topsoil material (initially excavated prior to waste rock placement and stored in berms) will be used to cover the cells.

Energy West conducted some basic calculations to estimate the average depth of cover to respond to the deficiency (see Response to Phase I Bond Release for the Old Cottonwood/Wilberg Waste Rock Site, PacifiCorp, Cottonwood/Wilberg Mine, ACT/015/019-BR98-1, File #2 dated March 5, 1999). The total excavated volume fo 106,915.6 cu. yds. was calculated using the cross-sections of the four as-built drawings (KS1142E) originally submitted December 17, 1998. The area between the excavated line and the natural ground line represents the volume of excavated soil material. The total cover volume was calculated by subtracting the calculated berm volume from he excavated volume. The cover volume equaled 79,859.6 cu.yds. Average cover depth throughout the waste rock site equals approximately 3.4 feet.

As requested by Mr. Davidson, Energy West took a sample core in Cell 7. The depth of the core was approximately 3 feet to the waste rock, which was consistent with the average depth of the calculated depth of cover.

The calculations satisfied any concerns the Division had on topsoil replacement depths and Phase I Bond release was granted on July 22, 1999.

The statement of "Average cover depth through the waste rock site equals approximately 3.4 feet" on page 5 in Appendix VII will remain unchanged.

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: Deficiency Responses to Amendment C/015/019-AM00A-1, PacifiCorp, Cottonwood/Wilberg Mine, C/015/019, 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 type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	15. Does application require or include soil removal, storage or placement?
<input type="checkbox"/> Yes	<input checked="" 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 type="checkbox"/> Yes	<input checked="" 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 type="checkbox"/> Yes	<input checked="" 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 7 complete clean copies and 4 redline/strikeout 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 Charles A. Semborski Geology/Permitting Supervisor 4/25/2002
 Signed - Name - Position - Date

Subscribed and sworn to before me this 25 day of April, 2002.

Lori Ann Anderson
 Notary Public
 My Commission Expires: 12/22, 2005
 Attest: STATE OF Utah COUNTY OF Emery



Received by Oil, Gas & Mining

ASSIGNED TRACKING NUMBER

