



GARY R. HERBERT  
Governor

SPENCER J. COX  
Lieutenant Governor

# State of Utah

## DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER  
Executive Director

### Division of Oil, Gas and Mining

JOHN R. BAZA  
Division Director

May 1, 2019

Howard Strand, Field Office Director  
Office of Surface Mining  
1999 Broadway, Suite 3320  
Denver, Colorado 80202-3050

Subject: Phase I Bond Release, PacifiCorp, Cottonwood/Wilberg Mine, C/015/0019, Task #5869

Dear Mr. Strand:

Enclosed is the Division's Decision Document for the Phase I bond release of the 29.37 acres for the Cottonwood/Wilberg mine complex and other supporting areas associated with the mine. PacifiCorp is requesting a bond reduction of \$1,465,849.00 at this time. The Division finds PacifiCorp has met the regulatory requirements for Phase I bond release and recommends approval. We request the Office of Surface Mining's concurrence with this determination. A copy of the Phase I bond release inspection report is included in this package along with the documentation of events. Please provide your determination at your earliest convenience.

If you have any questions or need further information, please feel free to call me at (801) 538-5350.

Sincerely,

Steve Christensen  
Coal Program Manager

Enclosure

cc: Alexis Long, OSM  
Kenneth Fleck, Interwest Mining

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Phase I Bond Release  
PacifiCorp  
Cottonwood/Wilberg Mine  
C/015/0019  
Emery County, Utah

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# DECISION DOCUMENT

Phase I Bond Release  
PacifiCorp  
Cottonwood/Wilberg Mine  
C/015/0019  
Emery County, Utah

## ACTION

Phase I bond release is requested for 29.37 acres for the Cottonwood/Wilberg mine complex and other supporting areas associated with the mine. At this time, PacifiCorp is applying for a 60% (\$1,465,849.00) bond release of the current required bond of \$2,443,081.00 leaving a balance of \$977,232.00.

## BACKGROUND

Final reclamation of the bonded areas (Cottonwood/Wilberg Mine 22.00 acres, Leach Field, 3.7 acres, Rock and Soil Storage Area 1.81 acres, and TMA and Belt Portal Area 1.86 acres for a total of 29.37 acres.) began in 2014 with the TMA and Belt Portal Area reclamation completed in Cottonwood Canyon. Most recently, the Cottonwood/Wilberg mine complex and the Rock and Soil Storage Area were completed in March of 2018. The leach field was revegetated after construction in 1978. The access road through the site was reclaimed in September of 2015.

PacifiCorp is seeking Phase I bond release of this 29.37 acre area.

## CHRONOLOGY FOR PHASE I BOND RELEASE

March 4, 2019	PacifiCorp submits the Phase I bond release application for the Cottonwood/Wilberg mine site area.
March 4, 2019	PacifiCorp sends letters to local governments, planning agencies, surface owners, and subsurface owners, notifying them of the proposed bond release: Darren Olsen, US Forest Service Emery County Commission Emery County Planning and Zoning Emery County Public Lands Emery County Conservancy District Cottonwood Creek Consolidated Irrigation Company Utah Division of Water Quality Utah State Historic Preservation Office Utah Division of Wildlife Resources Chris Conrad, Bureau of Land Management

March 5, 2019	The Division finds the bond release application administratively complete and approves the newspaper notice for publication.
March 6, 2019	The Division sends letters of invitation for the bond release inspection to be held March 27, 2019.
March 22, 2019	The Division notifies agencies of the cancellation of the bond release inspection to be held March 27, 2019 due to inclement weather at the mine site.
March 26, 2019	The Division reschedules the bond release inspection to be held April 17, 2019 and sends letters of invitation to: Emery County Commission Emery County Planning and Zoning Emery County Public Lands Emery Water Conservancy District Huntington-Cleveland Irrigation Company Cottonwood Creek Irrigation Company LaMar Guymon, Mayor, Huntington City Tom Faddies, State Institutional Trust Land Administration Marc Stilson, Utah Division of Water Rights Chris Wood, Utah Division of Wildlife Resources Donald Hartley, State Historic Preservation Office Stan Perks, Chris Conrad; Bureau of Land Management Howard Strand, Alexis Long; Office of Surface Mining Darren Olsen, Jeff Salow, Ryan Nehl; US Forest Service
March 6, 13, 20 & 27, 2019	Phase I Bond Release Published in the ETV 10 News.
April 9, 2019	Cottonwood/Wilberg updates reclamation bond totals.
April 17, 2019	Phase I Bond Release Republished for correction of bond and bond release amounts.
April 17, 2019	Phase I bond release inspection. In attendance: Ken Fleck, Chuck Semborski, Dennis Oakley; Interwest Mining Company Priscilla Burton, Steve Christensen, Justin Eatchel, Keenan Storrar; Utah Division of Oil, Gas & Mining Christine Belka, Alexis Long; Office of Surface Mining Jeff Salow, William Otto; US Forest Service Ray Peterson; Emery County Jay Humphrey, Emery Water Conservancy District

April 26, 2019	Public comment period closes: The Division receives no comments.
April 29, 2019	The Utah Division of Oil, Gas & Mining receives concurrence from the United States Forest Service
May 1, 2019	The Utah Division of Oil, Gas & Mining receives concurrence from the Bureau of Land Management

### **SUMMARY OF FINDINGS**

The Phase I bond release was advertised for four consecutive weeks. A corrected public notice was advertised on April 17, 2019. No comments were received during the public comment period. A bond release inspection was conducted on April 17, 2019. No problems were identified. The technical analysis for Phase I bond release for the 29.37 acres of the Cottonwood/Wilberg mine site areas is attached.

### **PHASE I BOND RELEASE RECOMMENDATION**

The recommendation is that the Division approves Phase I bond release for the 29.37 acre area and approve a 60% (\$1,465,849.00) bond release of the current required bond of \$2,443,081.00 leaving a balance of \$977,232.00.



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# State of Utah

DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER  
Executive Director

Division of Oil, Gas and Mining

JOHN R. BAZA  
Division Director

## Technical Analysis and Findings

### Utah Coal Regulatory Program

**PID:** C0150019  
**TaskID:** 5869  
**Mine Name:** COTTONWOOD/ WILBERG  
**Title:** PHASE I BOND RELEASE

## Summary

The permittee for the Cottonwood/Wilberg mine has applied for Phase I Bond Release for all 29.37 disturbed acres associated with the mine site. The Division conducted a Phase I Bond Release Inspection for the Cottonwood/Wilberg mine on April 17, 2019. The four sites associated with the Cottonwood/Wilberg permit were visited to ensure proper backfilling and grading of the disturbed areas. The four sites include the TMA and Belt Portal Area in Cottonwood Canyon, the Rock and Soil Storage Area, the Leach Field, and the Cottonwood/Wilberg Mine site. The total reclaimed acreage of 29.37 acres meets the State of Utah R645 requirements to receive Phase I Bond Release. The application is assigned Task #5869.

Those in attendance at the bond release inspection included Chuck Semborski, Ken Fleck, and Dennis Oakley of PacifiCorp, Christine Belka and Alexis Long of OSMRE, Jay Humphrey of EWCD, Ray Petersen of Emery County, and Jeff Salow and William Otto of the USFS. Refer to Inspection Report #6398 for additional information and photos.

kstorrar

## General Contents

### Public Notice and Comment

#### Analysis:

The application meets the State of Utah R645 requirements for Public Notice of Phase I Bond Release.

The permittee is applying for Phase I Bond Release for the 29.37 disturbed acres associated with the mine. The application is assigned Task #5869. The permittee submitted a copy of the advertisement placed with the local news publication [www.etvnews.com](http://www.etvnews.com). The notice ran for four consecutive weeks. In addition, the permittee has submitted copies of the letters sent to the local governments bodies, property owners, planning agencies and water users. Those notified include: the USDA Forest Service – Price Field Office, USDI Bureau of Land Management – Price Field Office, Utah DEQ Division of Water Quality, Utah State Historic Preservation Office, Utah DNR Division of Wildlife Resources, Emery County Commission, Emery County Public Lands, Emery County Planning Commission, Emery County Conservancy District, and the Cottonwood Creek Consolidated Irrigation Company.

kstorrar

## Reclamation Plan

## Topsoil and Subsoil

### Analysis:

This application for bond release of 29.37 acres meets the phase 1 bond release requirements of R645-301-880.310, because the Permittee has completed backfilling and grading of the 22.0 acre Cottonwood/Wilberg Mine site, the 3.7 acre leach field, the 1.81 acre rock and soil storage area, and the 1.86 acre TMA and belt portal area. Soils analyses included in Attachment 5 of the bond release application reveal that Left Fork and Main Channel of Grimes Wash have unacceptable SAR values in five locations. The MRP will be updated to include these locations during the annual spring evaluation of the site and annual vegetation monitoring report on p. 14 of Vol 2, Part 4 (personal communication with D. Oakley, 4/3/2019).

Location of the bonded areas are described in the narrative and shown on the Master Bond Map included in Attachment 4 of the application. Plates 1 through 4 (included in the application) illustrate the final topography of the Cottonwood Mine Area, Leach Field, Rock and Soil Area and the TMA & belt portals.

Attachment 5 of the phase 1 bond release states that approximately 10,000 CY of cut was used as substitute topsoil. Approximately 6,870CY was from the upper pad and the remainder was hauled from the soil and rock storage area.

The location of substitute topsoil salvage for reclamation of the Cottonwood Mine is shown on Plate 4C. Laboratory analysis of soils is provided in Attachment 5 of the bond release application. Soil sampling locations and details of analysis are found on the plate in Appendix A-2, making this plate a very handy field reference.

This data indicates that Left Fork locations CTW1417, CTW1517, CTW0118 and CTW0218, and main channel location CTW0918 are soils high in sodium. BYU laboratories reported SAR values of 18 to 41 at these locations from the surface down to the 48 inch sampling depth. Table 4 of the Division's "Guidelines for Topsoil and Overburden" regards SAR values between 10 – 20 as poor quality for sandy textured soils, and regards values greater than 20 as unacceptable for sandy textured soils in the surface four feet. At all these locations, pH and EC values were suitable (in the good to fair category as described in Table 4 of the Division's Guidelines for Topsoil and Overburden)

These locations must be monitored for vegetation growth and regraded or reseeded as necessary.

pburton

## Hydrological Information Reclamation Plan

### Analysis:

The amendment meets the State of Utah R645 requirements for Hydrologic Reclamation.

The reclaimed mine and associated disturbed areas are backfilled and graded to complement the drainage patterns of the surrounding terrain. The application provides plan view maps of backfilled and reclaimed areas for the Phase I bond release. The 'Phase I – Map 1' through 'Phase I – Map 4' maps show the reclaimed areas blend seamlessly into the adjacent topographic contours. All roads have been removed and natural drainage patterns are established throughout the disturbed areas.

The disturbed areas of the mine site and Cottonwood breakouts are stabilized with the implementation of pocking as the Best Technology Currently Available (BTCA). Pocking of the backfilled and reclaimed hillslopes is preventing sediment from eroding and migrating downslope into the reclaimed channels and subsequently offsite. Given pocking was established as the BTCA for this site, the North and South sediment ponds were reclaimed contemporaneously during site reclamation.

There are no groundwater monitoring wells associated with the Cottonwood/Wilberg mine.

kstorrar

## Revegetation General Requirements

### Analysis:

The application meets the State of Utah R645-301-353 requirements for revegetation general requirements. The seed mixture used in final reclamation of the Cottonwood/Wilberg site is found in Volume 2, Part 4, R645-301-300 of the

MRP. The most recent seeding in the Rock and Soil Storage Area and Cottonwood/Wilberg Mine site occurred in March 2018. Other permitted areas had been seeded previously, dating back to 1978.

tmiller

## Stabilization of Surface Areas

### Analysis:

The application meets the requirements of R645-301-880.310 because the sites were seeded and mulched as described in Attachment 5 of the bond release application. A site visit on April 17, 2019 confirmed the site was stable after the first winter during which a lot of snow accumulated at the site and the watershed above.

pburton

## Maps Bonded Area

### Analysis:

The application meets the State of Utah requirements for Bonded Area Maps.

The application satisfies the requirements for R645-301-820.113 because of information included on the Cottonwood Master Bond Map. This map includes an overview of the entire Cottonwood/Wilberg Mine permit area and includes previous bond release dates for various areas of the permit. The bonded areas currently being considered for Phase 1 bond release are highlighted in bold red text, and enlarged maps 1 - 4 offer a more detailed description of acreage and as-built conditions.

jeatchel

## Maps Reclamation Final Surface Configuration

### Analysis:

The application meets the State of Utah R645 requirements for Reclamation Final Surface Configuration Maps.

The application satisfies the requirements for R645-301-521.150, R645-301-542.200 because final configuration maps have been included portraying as-built surfaces within the disturbed areas shown. Final surface contours have been illustrated on the following maps: Phase 1 - Map 1 Cottonwood/Wilberg Mine Phase 1 Final Reclamation Mine Complex As-Built Map, Phase 1 - Map 2 Cottonwood/Wilberg Mine Phase 1 Final Reclamation Leach Field As-Built Map, Phase 1 - Map 3 Cottonwood/Wilberg Mine Phase 1 Final Reclamation Rock and Soil Area As-Built Map, Phase 1 - Map 4 Cottonwood/Wilberg Mine Phase 1 Final Reclamation TMA & Belt Portal As-Built Map. All four maps are contoured at intervals that appropriately convey the details of the final geomorphology.

jeatchel

## Bonding Determination of Amount

### Analysis:

The application meets the State of Utah R645 requirements for Determination of Bonding Amount.

The application satisfies the requirements of R645-301-830 because a detailed bond summary has been included that shows all of the reclamation costs escalated to 2021. The total reclamation liability amounts to \$2,443,081, and the Permittee is applying for a 60% release of \$1,465,849. The remaining liability after the approval of Phase 1 bond release will be \$977,232.

jeatchel

**PROOF OF PUBLICATION AFFIDAVIT**

I, Scottie Draper, being first duly sworn, state that I am the Publisher of ETV News, a weekly newspaper of general circulation published at Price, County of Carbon, State of Utah; and that the advertisement or notice, a printed copy of which is attached hereto, was printed and published in said newspaper for four issues and on www.utahlegals.com website as follows:

March 6, 2019

March 13, 2019

March 20, 2019

March 27, 2019

Scottie Draper

Scottie Draper, Editor

Subscribed to and sworn before me this 27<sup>th</sup> day of March, 2019.

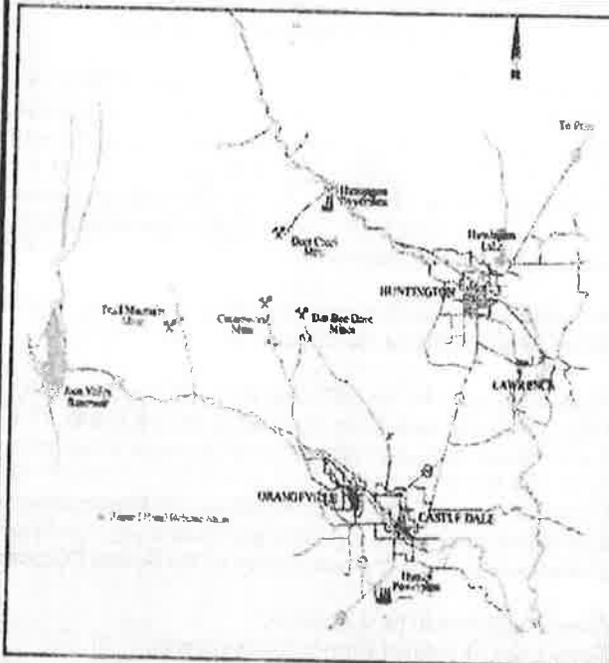


Tanya Short  
Notary Public

**Phase I Bond Release Application**  
**PacifiCorp**  
**Cottonwood/Wilberg Mine**  
**C/015/0019**  
**Permit Approval Date: July 6, 2014 (revised May 18, 2015)**

PacifiCorp, by and through its wholly-owned subsidiary, Interwest Mining Company as mine manager, has filed with the Division of Oil, Gas and Mining an application for Phase I Bond Release for 29.37 acres of the Cottonwood/Wilberg Mine Complex and remote permit areas. Its permit for operations pertaining to surface and underground mining activities was approved on July 6, 2014 (revised May 18, 2015) for the following areas:

Area	Location	Total acreage	Land Ownership
Cottonwood/Wilberg Mine Leach Field Rock and Soil Storage Area	Township 17 South Range 7 East Sec 27: NW/4NE/4	22.0	USFS
	Sec 34: NW/4NE/4	3.7	BLM
	Sec 34: NE/4NE/4	1.81	BLM
TMA and Belt Portal Area	Township 17 South Range 6 East Sec 25: SW/4NE/4, NW/4SE/4	1.86	PacifiCorp
	<b>Total</b>	<b>29.37</b>	



Underground mining operations at the Cottonwood and Wilberg mines were terminated in June 2001. All portals were sealed at that time. The mine remained in a state of temporary cessation from 2001 to 2014. In 2014, final reclamation was completed at the Trail Mountain Access (TMA) and belt portal area located adjacent to the Trail Mountain Mine in Cottonwood Canyon. Demolition activities of the Cottonwood/Wilberg mine complex were completed in 2015. In March of 2018, final reclamation for the remaining disturbed areas of the Cottonwood/Wilberg mine were completed in the left and right forks of Grimes Wash and the rock and soil storage area located approximately 1/2 mile to the south of the mine site adjacent to SR57.

Phase I Bond Release can be considered after the applicant has demonstrated to the Division that all reclamation requirements for backfilling, regrading, and drainage control measures have been satisfied. Topsoil has also been replaced, drainage channels have been constructed, and sediment control measures (including revegetation) have been provided at all of these reclaimed sites. PacifiCorp asserts that it has satisfied the Phase I Bond Release requirements.



Underground mining operations at the Cottonwood and Wilberg mines were terminated in June 2001. All portals were sealed at that time. The mine remained in a state of temporary cessation from 2001 to 2014. In 2014, final reclamation was completed at the Trail Mountain Access (TMA) and belt portal area located adjacent to the Trail Mountain Mine in Cottonwood Canyon. Demolition activities of the Cottonwood/Wilberg mine complex were completed in 2015. In March of 2018, final reclamation for the remaining disturbed areas of the Cottonwood/Wilberg mine were completed in the left and right forks of Grimes Wash and the rock and soil storage area located approximately ½ mile to the south of the mine site adjacent to SR57.

Phase I Bond Release can be considered after the applicant has demonstrated to the Division that all reclamation requirements for backfilling, regrading, and drainage control measures have been satisfied. Topsoil has also been replaced, drainage channels have been constructed, and sediment control measures (including revegetation) have been provided at all of these reclaimed sites. PacifiCorp asserts that it has satisfied the Phase I Bond Release requirements.

The approved reclamation bond for the Cottonwood/Wilberg Mine amounts to \$2,365,895.00. A surety bond has been filed with the Division and is payable to the State of Utah, Division of Oil, Gas, and Mining (UDOGM), and the Office of Surface Mining Reclamation and Enforcement (OSM). PacifiCorp is requesting a release of 60% (\$1,419,537.00) of the reclamation bond as allowed by the Utah Coal Regulations.

A copy of the Phase I Bond Release application may be examined at the office of the Division of Oil, Gas and Mining, 1594 West North Temple, Suite 1210, Salt Lake City, Utah 84114-5801 and also at the Records Office located in the Emery County Courthouse in Castle Dale, Utah. Written comments, objections, or requests for an informal conference may be submitted to the Division of Oil, Gas, and Mining address above. Said comments must be submitted thirty (30) days from the date of the last publication of this notice.

This notice is being published to comply with the Surface Mining Control and Reclamation Act of 1977, and State and Federal regulations promulgated pursuant to said Act.

Published in ETV News March 6, 13, 20 and 27, 2019.

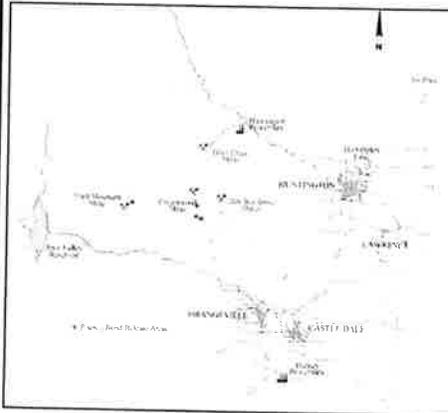
(CORRECTION)

**Phase I Bond Release Application  
PacifiCorp  
Cottonwood/Wilberg Mine  
C/015/0019**

Permit Approval Date: July 6, 2014 (revised May 18, 2015)

PacifiCorp, by and through its wholly-owned subsidiary, Interwest Mining Company as mine manager, with a street address as 15 North Main, Huntington, Utah, has filed with the Division of Oil, Gas and Mining an application for Phase I Bond Release for 29.37 acres of the Cottonwood/Wilberg Mine Complex and remote permit areas. Its permit for operations pertaining to surface and underground mining activities was approved on July 6, 2014 (revised May 18, 2015) for the following areas:

Area	Location	Total Acres	Land Ownership
Cottonwood/Wilberg Mine Leach Field Rock and Soil Storage Area	Township 12 South Range 7 East	22.0	USFS
	Sec 27: NW/NE/SE	3.7	BLM
	Sec 34: NE/NE/SE	1.81	BLM
TMA and Belt Portal Area	Township 17 South Range 6 East	1.66	PacifiCorp
	Sec 25: SW/NE/NE, NW/NE/NE		
Total		29.37	



Underground mining operations at the Cottonwood and Wilberg mines were terminated in June 2001. All portals were sealed at that time. The mine remained in a state of temporary cessation from 2001 to 2014. In 2014, final reclamation was completed at the Trail Mountain Access (TMA) and belt portal area located adjacent to the Trail Mountain Mine in Cottonwood Canyon. Demolition activities of the Cottonwood/Wilberg mine complex was completed in 2015. In March of 2018, final reclamation for the remaining disturbed areas of the Cottonwood/Wilberg mine were completed in the left and right forks of Grimes Wash and the rock and soil storage area located approximately 1/2 mile to the south of the mine site adjacent to SR57.

Phase I Bond Release can be considered after the applicant has demonstrated to the Division that all reclamation requirements for backfilling, regrading, and drainage control measures have been satisfied. Topsoil has also been replaced, drainage channels have been constructed, and sediment control measures (including revegetation) have been provided at all of these reclaimed sites. PacifiCorp asserts that it has satisfied the Phase I Bond Release requirements.

The approved reclamation bond for the Cottonwood/Wilberg Mine amounts to \$2,443,081.00. A surety bond has been filed with the Division and is payable to the State of Utah, Division of Oil, Gas, and Mining (UDOGM), and the Office of Surface Mining Reclamation and Enforcement (OSM). PacifiCorp is requesting a release of 60% (\$1,465,849.00) of the reclamation bond as allowed by the Utah Coal Regulations.

A copy of the Phase I Bond Release application may be examined at the office of the Division of Oil, Gas and Mining, 1594 West North Temple, Suite 1210, Salt Lake City, Utah 84114-5801 and also at the Recorders Office located in the Emery County Courthouse in Castle Dale, Utah. Written comments, objections, or requests for an informal conference may be submitted to the Division of Oil, Gas, and Mining address above. Said comments must be submitted thirty (30) days from the date of the last publication of this notice.

This notice is being published to comply with the Surface Mining Control and Reclamation Act of 1977, and State and Federal regulations promulgated pursuant to said Act.

Published in the Emery County ETV News Progress for four consecutive weeks beginning March 6, 13, 20, and 27, 2019. Republished for correction of bond and bond release amounts: April 17, 2019.



**GARY R. HERBERT**  
Governor  
**GREG BELL**  
Lieutenant Governor

# State of Utah

## DEPARTMENT OF NATURAL RESOURCES

**MICHAEL R. STYLER**  
Executive Director

### Division of Oil, Gas and Mining

**JOHN R. BAZA**  
Division Director

# Inspection Report

Permit Number:	<b>C0150019</b>
Inspection Type:	<b>BOND RELEASE</b>
Inspection Date:	Wednesday, April 17, 2019
Start Date/Time:	4/17/2019 8:00:00 AM
End Date/Time:	4/17/2019 1:00:00 PM
Last Inspection:	Wednesday, March 27, 2019

Inspector: Keenan Storrar

Weather: Sunny, 65 F

InspectionID Report Number: 6398

Accepted by: SCHRISTE  
4/29/2019

Representatives Present During the Inspection:	
OGM	Justin Eatchel
OGM	Steve Christensen
OGM	Priscilla Burton
Company	Dennis Oakley
Company	Kenneth Fleck
OSM	Christine Belka
OSM	Alexis Long
Company	Chuck Semborski
OGM	Keenan Storrar

Permittee: **PACIFICORP**

Operator: **INTERWEST MINING CO**

Site: **COTTONWOOD/ WILBERG**

Address: **PO BOX 310, HUNTINGTON UT 84528**

County: **EMERY**

Permit Type: **PERMANENT COAL PROGRAM**

Permit Status: **ACTIVE**

#### Current Acreages

4,092.00	<b>Total Permitted</b>
29.37	<b>Total Disturbed</b>
21.30	<b>Phase I</b>
21.30	<b>Phase II</b>
21.30	<b>Phase III</b>

#### Mineral Ownership

- Federal
- State
- County
- Fee
- Other

#### Types of Operations

- Underground
- Surface
- Loadout
- Processing
- Reprocessing

#### Report summary and status for pending enforcement actions, permit conditions, Division Orders, and amendments:

The Division conducted a Phase I Bond Release Inspection for the Cottonwood/Wilberg mine on April 17, 2019. The four sites associated with the Cottonwood/Wilberg permit were visited to ensure proper backfilling and grading of the disturbed areas. The four sites include the TMA and Belt Portal Area in Cottonwood Canyon, the Rock and Soil Storage Area, the Leach Field, and the Cottonwood/Wilberg Mine site. The total reclaimed acreage of 29.37 acres meets the State of Utah R645 requirements to receive Phase I Bond Release.

Those in attendance at the bond release inspection included Chuck Semborski, Ken Fleck, and Dennis Oakley of PacifiCorp, Christine Belka and Alexis Long of OSMRE, Jay Humphrey of EWCD, Ray Petersen of Emery County, and Jeff Salow and William Otto of the USFS.

Inspector's Signature:

Keenan Storrar,

Inspector ID Number: 71

Date

Friday, April



1504 West North Temple, Suite 1210, PO Box 145801, Salt Lake City, UT 84114-5801  
 Note: This inspection report does not constitute an affidavit of compliance with the regulatory program of the Division of Oil, Gas and Mining.  
 telephone (801) 538-5340 • facsimile (801) 359-3940 • TTY (801) 538-7458 • www.ogm.utah.gov

Permit Number: C0150019  
Inspection Type: BOND RELEASE  
Inspection Date: Wednesday, April 17, 2019

**Inspection Continuation Sheet**

**REVIEW OF PERMIT, PERFORMANCE STANDARDS PERMIT CONDITION REQUIREMENTS**

1. Substantiate the elements on this inspection by checking the appropriate performance standard.
  - a. For COMPLETE inspections provide narrative justification for any elements not fully inspected unless element is not appropriate to the site, in which case check Not Applicable.
  - b. For PARTIAL inspections check only the elements evaluated.
2. Document any noncompliance situation by reference the NOV issued at the appropriate performance standard listed below.
3. Reference any narratives written in conjunction with this inspection at the appropriate performance standard listed below.
4. Provide a brief status report for all pending enforcement actions, permit conditions, Division Orders, and amendments.

	Evaluated	Not Applicable	Comment	Enforcement
1. Permits, Change, Transfer, Renewal, Sale	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Signs and Markers	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Topsoil	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4.a Hydrologic Balance: Diversions	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4.b Hydrologic Balance: Sediment Ponds and Impoundments	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4.c Hydrologic Balance: Other Sediment Control Measures	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.d Hydrologic Balance: Water Monitoring	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.e Hydrologic Balance: Effluent Limitations	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5. Explosives	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Disposal of Excess Spoil, Fills, Benches	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. Coal Mine Waste, Refuse Piles, Impoundments	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. Noncoal Waste	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. Protection of Fish, Wildlife and Related Environmental Issues	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10. Slides and Other Damage	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11. Contemporaneous Reclamation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12. Backfilling And Grading	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
13. Revegetation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
14. Subsidence Control	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
15. Cessation of Operations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
16.a Roads: Construction, Maintenance, Surfacing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
16.b Roads: Drainage Controls	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
17. Other Transportation Facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
18. Support Facilities, Utility Installations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
19. AVS check	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
20. Air Quality Permit	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
21. Bonding and Insurance	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
22. Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**1. Permits, Change, Transfer, Renewal, Sale**

The permittee is applying for Phase I Bond Release for the 29.37 disturbed acres associated with the mine. The application is assigned Task #5869. The permittee submitted a copy of the advertisement placed with the local news publication [www.etvnews.com](http://www.etvnews.com). The notice ran for four consecutive weeks.

**3. Topsoil**

The locations noted on Plate Appendix A-2 with high SAR values at the Cottonwood reclaimed site (CTW 1417, CTW 1517, CTW 0118, CTW0218 and CTW0718) were observed and photographed.

**4.a Hydrologic Balance: Diversions**

The reclaimed land surface seamlessly transitions to the adjacent surrounding undisturbed area. The drainage matches and compliments the surrounding drainage patterns. Diversions are stable and are as designed in the approved MRP.

**4.b Hydrologic Balance: Sediment Ponds and Impoundments**

Sediment ponds have been removed and pocking is implemented on all hillslopes. The pocks are capturing and treating all runoff, preventing off-site impacts.

**4.e Hydrologic Balance: Effluent Limitations**

The Permittee will continue to monitor and report on sites within the water monitoring program.

**12. Backfilling And Grading**

The previously disturbed areas at the Trail Mountain Access (TMA) and Belt Portal Area in Cottonwood Canyon were reclaimed in late 2014. Slopes have been regraded to AOC and pocked to arrest erosion and encourage revegetation.

Many of the boulders and oversize rocks at the Rock and Soil Storage Area were removed and used as rip rap and/or landscaping at the main Cottonwood/Wilberg site. The remaining surfaces have been regraded to AOC, pocked, and hydroseeded.

The entirety of the Main Cottonwood/Wilberg mine site currently appears stable. The slopes between the undisturbed areas down to the newly established main drainage have been regraded to AOC and pocked. Straw was mixed into the topsoil upon final placement and hydroseed applied.

**13. Revegetation**

Blades of grass are beginning to emerge at the topsoil and rock storage area and at the mine site. Vegetation is well established at the reclaimed conveyor portal in Cottonwood Canyon. One area of erosion at the conveyor portal was observed on the slope below and slightly North (up canyon) of the reclaimed portal, however it had not affected vegetation establishment.

Permit Number: C0150019  
Inspection Type: BOND RELEASE  
Inspection Date: Wednesday, April 17, 2019

**Inspection Continuation Sheet**

**Page 5 of 5**

**21. Bonding and Insurance**

The current revised reclamation estimate is \$2,443,081, and accounts for a 5-year escalation to 2021 using an escalation factor of 0.007 which was the escalation factor for 2016, the year of most recent midterm permit review. Permittee is adequately bonded since the current surety posted with the Division is \$2,779,000.

**ATTACHMENT A – Cottonwood Phase I Bond Release Inspection April 29, 2019**



Lower Grimes Wash Soil locations CTW0718 on left and CTW0918 on right



East facing slope Left Fork Grimes Wash Soil locations CTW0118 and CTW 1517



East facing slope Left Fork Grimes Wash soil location CTW1417



PHOTO 4  
Reclaimed TMA and Belt Portal Area in Cottonwood Canyon



UTAH COAL PROGRAM

**ATTACHMENT A – Cottonwood Phase I Bond Release Inspection April 29, 2019**



**PHOTO 5**  
Reclaimed Rock and Soil Storage Area



**PHOTO 6**  
Reclaimed Leach Field



**PHOTO 7**  
Reclaimed Cottonwood/Wilberg mine site



**PHOTO 8**  
Pocks stabilizing hillslopes, channels ripped and stabilized





File Code: 2820

Date: April 25, 2019

Steve Christensen  
Coal Program Manager  
Utah Division of Oil, Gas and Mining  
1594 West North Temple, Suite 1210  
Salt lake City, Utah 84114-5801

RECEIVED  
APR 29 2019  
DIV OF OIL, GAS & MINING

Dear Mr. Christensen,

The Manti-La Sal National Forest (FS) is responding to the Phase I bond release of PacifiCorp's Cottonwood/Wilberg Mine. The FS attended the Phase I bond release inspection for this mine on April 17, 2019. The FS is satisfied with the reclamation completed for this site and has no further expectations from PacifiCorp on the 29.37 acres.

Thus, the FS concurs with the Phase I bond release of the Cottonwood/Wilberg Mine.

Thank you for consulting the FS regarding this matter. If you have any questions or concerns, please feel free to contact Jeff Salow at 435-636-3596 or [jsalow@fs.fed.us](mailto:jsalow@fs.fed.us)

Sincerely,

Ryan Nehl  
Forest Supervisor

Enclosure

cc: Heidie Torrealday, USFS, Mike Glasson, (BLM), Alexis Long (OSMRE)





# United States Department of the Interior



BUREAU OF LAND MANAGEMENT  
Green River District  
Price Field Office  
125 South 600 West  
Price, UT 84501  
<http://www.blm.gov/ut/st/en/fo/price.html>

In Reply Refer To:  
3400 (MWG) UTG023  
UTSL-64900, UTU-083066

Received May 1, 2019

State of Utah  
Department of Natural Resources  
Division of Oil, Gas and Mining  
1594 W North Temple  
Salt Lake City, UT 84116

Attn: John Baza, Director

Re: Interwest Mining/PacifiCorp Phase I Reclamation Bond Release,  
Cottonwood/Wilberg Mine Complex (ACT 015/0019)

Dear Mr. Baza,

Please be advised that the Bureau of Land Management (BLM), on April 26, 2019, visited the Cottonwood/Wilberg Mine, surface facilities complex. The reason for the visit was to review and make a determination as to whether the BLM concurs with a Phase I bond release requested by Interwest Mining/PacifiCorp (Interwest). The Utah Division of Oil Gas and Mining (DOGGM) has requested concurrence from various agencies who have a direct interest and authority to make such a determination, including the BLM. It is the BLM's opinion that the reclamation work which is required for a Phase I bond release has been completed and is adequate, if not superior; therefore, BLM concurs with the DOGM proposal to release Interwest from its reclamation bond, specifically the requirements for Phase I release.

Please contact this office in writing with any further questions or you may call Michael Glasson at this office (435) 636-3651.

Sincerely,

A handwritten signature in blue ink that reads "Chris Conrad". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Chris Conrad  
Price Field Office Manager