

0005

file PRO/007/933 #2



ANDALEX
RESOURCES, INC.
Tower Division

P.O. BOX 902
PRICE, UTAH 84501
PHONE (801) 637-5385

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**DIVISION OF OIL,
GAS & MINING
PRICE, UTAH**

October 14, 1988

State of Utah
Department of Natural Resources
Division of Oil, Gas, and Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

**DIVISION OF
OIL, GAS & MINING**

Attn.: Mr. John Whitehead

Dear Mr. Whitehead:

Pursuant to your letter of September 30, 1988, Andalex has prepared the following responses to your comments regarding the completeness of the PAP for the Wildcat Loadout, PRO 007/033.

Included herewith are two copies each of: a) table of contents; b) Chapters III and IV; c) addendums to appendices H and I, and a new Appendix J; d) one new Appendix (M); and e) revised Plates 1, 2, 8, 9, and 15.

UMC 783.16 Surface Water Information

Water monitoring plans are discussed on page 120. To the operator's knowledge, no rainfall events occurred that produced measurable runoff at the monitoring sites, during times when personnel were on site, during the second and third quarters. Events may have occurred that produced measurable runoff, but were likely on a weekend or at night when no one was available to sample.

Monitoring sites will continue to be checked during or shortly after events, and samples will be collected at all reasonable opportunities. Samples were collected for all four sites on October 12, 1988 and are currently being analyzed. Please refer to Appendix M. An individual at the loadout has been assigned the responsibility of collection of water samples when regular Andalex personnel are not on site.



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UMC 783.19 Vegetation Information

- (a) Field data sheets from reference area sampling have been included in Appendix I.

Sections 1 and 2.2 found on page 42, have been updated to include a third reference area chosen by DOGM and Andalex. Sections 2.4 and 2.5, page 46, have been deleted. The Division's memo in Appendix I, has been deleted.

UMC 783.20 Fish and Wildlife Resources Information

- (a) Division of Wildlife Resources' Fish and Wildlife Plan (page 46, last paragraph) has been moved to Chapter IV, page 133. The description of the Wildlife Enhancement Project can now be found in Chapter IV, pages 136 and 137.

Section 2, Source of Data, has been updated and can now be found on page 48.

Table III-8, Animals Possibly Occurring in the Region, page 50, now includes the Whitetail Prairie Dog.

UMC 783.24 Maps: General Requirements

Plate 1 has again been revised correctly depicting all disturbed or bonded areas inside the boundaries of the permit area. Please note that the permit area has been revised to include ditch UD-1 and existing access roads.

Right-of-entry information for diversions UD-1 and UD-2, along with right-of-entry information on existing access roads, is currently being processed by the Bureau of Land Management. A minor modification to the right-of-way was required. The B.L.M. has assured Andalex that this approval is forthcoming. In anticipation of this approval, Andalex has revised the permit boundary accordingly.

UMC 784.13 Reclamation Plan: General Requirements

- (b)(5)(ii) The range of values for seeding rates (permanent seed mix, page 84), has been revised. Low end values of the range have been used for grasses and forbs. The upper end value has been used for winter fat. Section 5.1, page 79 and Section 5.4, page 82, have been revised to reflect final seeding rates.



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The statement that BLM revegetation suggestions will be incorporated into the overall plan has been deleted from Section 5.8, page 85.

(b)(5)(iii) Pages 71 and 82 have been revised. Please refer to Section 5.6, page 83, for detail on mulch type, rate of application, and tackifier for each seeding method.

(b)(5)(vi) A revegetation monitoring schedule can be found on page 81. Andalex has committed to quantitative sampling of reclamation cover, frequency, and woody plant density during years 2, 3, 5, 9, and 10. All other parameters and time frames outlined in the Division's guidelines have been incorporated. Please refer to pages 85 and 86.

UMC 784.14 Reclamation Plan: Protection of the Hydrologic Balance

(c) Baseline water monitoring results are summarized in Appendix M of this PAP. Please note that samples have been taken to date for the fourth quarter of 1988 only. Quarterly sampling when runoff occurs for the next two years, is committed to. Also refer to Appendix J, page 4.

Please refer to page 2 and Attachment 4 of Appendix J for "Comparison of Leachate Tests to Utah Agricultural Water Quality Standards".

UMC 784.16 Reclamation Plan: Ponds, Impoundments, Banks, Dams, and Embankments

(a)(1)(7) The certification for Pond E has been revised to accurately reflect its current status. Please refer to Appendix H.

UMC 784.21 Fish and Wildlife Plan

Paragraph 4, page 130, and paragraph 3, page 131, have been deleted.

Page 135 describes the work and time frames pertaining to all crossarm-type configurations between the substation and the loadout.



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(b)(3) The Wildlife Enhancement Project can now be found in Chapter IV, pages 135 thru 137. The text has been updated to describe additional enhancement of 15 acres in the vicinity of the Wildcat Loadout as per the agreement between Andalex and the UDWR.

UMC 784.22 Diversions

Please refer to page 129 of the PAP; Table IV-13A, page 127; and Figures IV-3 and IV-4, pages 130 and 131.

Plate 8 has been revised to include topographic detail including berms to ensure that all disturbed area drainage will report to a sedimentation control structure.

The attached information should be all the Division needs to determine this PAP to be complete according to the Division's comments. Please don't hesitate to call this office if any questions should arise.

Sincerely,

Michael W. Glasson
Senior Geologist

MWG/as

Enclosures

cc: File