

Los Angeles  Department of Water & Power

ERIC GARCETTI  
Mayor

Commission  
MEL LEVINE, *President*  
WILLIAM W. FUNDERBURK JR., *Vice President*  
JILL BANKS BARAD  
MICHAEL F. FLEMING  
CHRISTINA E. NOONAN  
BARBARA E. MOSCHOS, *Secretary*

MARCIE L. EDWARDS  
General Manager

May 19, 2014

**Sent via Email on May 19, 2014**

5/19/2014  
C/007/0033  
#4593

Utah Division of Oil, Gas & Mining Coal Program (DOGM)  
1594 West North Temple, Suite 1210  
P.O. Box 145801  
Salt Lake City, Utah 84114-5801

Dear Permit Supervisor:

Subject: Intermountain Power Agency (IPA) Response to Deficiencies Identified in  
May 7, 2014 DOGM letter Task ID #4577 to IPA regarding Wildcat  
Loadout Facility, C/007/0033

IPA is respectfully submitting, via email, clean copies of the amendments to our DOGM Permit C/007/0033 Wildcat Loadout Mining and Reclamation Plan. These amendments are in response to DOGM's May 7, 2014 letter, Task ID #4577, to IPA regarding deficiencies identified in IPA's April 11, 2014 permit amendment in response to NOV # 10132.

In response to DOGM's May 7, 2014 letter, minor revisions were required on pages 2-24 and 2-25. These revisions were based on recent discussions between DOGM's Ms. Priscillia Burton and Mr. John (Kit) Pappas.

For your convenience, an electronic copy of all submittal materials have been sent to DOGM via email to [ogmcoal@utah.gov](mailto:ogmcoal@utah.gov) on May 19, 2014 with 3 copies of the full-size maps with a certified Professional Engineer stamp transmitted via United States Postal Service which should be delivered to DOGM at the end of the week of May 19, 2014.

If you have any comments or questions, please contact me at (801) 748-1471.

Sincerely,



Lance C. Lee  
Project Manager  
Intermountain Power Project

cc: James A. Hewlett (via email)  
Intermountain Power Agency  
Minh T. Le (via email)  
William W. Engels (via email)

**Los Angeles Aqueduct Centennial Celebrating 100 Years of Water 1913-2013**

111 N. Hope Street, Los Angeles, California 90012-2607 Mailing address: Box 51111, Los Angeles, CA 90051-5700  
Telephone: (213) 367-4211 [www.LADWP.com](http://www.LADWP.com)

# APPLICATION FOR COAL PERMIT PROCESSING

## Detailed Schedule Of Changes to the Mining And Reclamation Plan

**Permittee:** INTERMOUNTAIN POWER AGENCY **Permit Number:** C/007/0030  
**Mine:** WILDCAT LOADOUT  
**Title:** RESPONSE TO TASK ID #4577 - CLEAN COPIES

Provide a detailed listing of all changes to the Mining and Reclamation Plan, which is required as a result of this proposed permit application. Individually list all maps and drawings that are added, replaced, or removed from the plan. Include changes to the table of contents, section of the plan, or other information as needed to specifically locate, identify and revise the existing Mining and Reclamation Plan. Include page, section and drawing number as part of the description.

### DESCRIPTION OF MAP, TEXT, OR MATERIAL TO BE CHANGED

<input type="checkbox"/> Add	<input type="checkbox"/> Replace	<input checked="" type="checkbox"/> Remove	CHAPTER 2 PAGE 2-1
<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	CLEAN COPY - CHAPTER 2 PAGE 2-1
<input type="checkbox"/> Add	<input type="checkbox"/> Replace	<input checked="" type="checkbox"/> Remove	CHAPTER 2 PAGE 2-6
<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	CLEAN COPY - CHAPTER 2 PAGE 2-6
<input type="checkbox"/> Add	<input type="checkbox"/> Replace	<input checked="" type="checkbox"/> Remove	CHAPTER 2 PAGE 2-7
<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	CLEAN COPY - CHAPTER 2 PAGE 2-7
<input type="checkbox"/> Add	<input type="checkbox"/> Replace	<input checked="" type="checkbox"/> Remove	CHAPTER 2 PAGE 2-22
<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	CLEAN COPY - CHAPTER 2 PAGE 2-22
<input type="checkbox"/> Add	<input type="checkbox"/> Replace	<input checked="" type="checkbox"/> Remove	CHAPTER 2 PAGE 2-24
<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	CLEAN COPY - CHAPTER 2 PAGE 2-24
<input type="checkbox"/> Add	<input type="checkbox"/> Replace	<input checked="" type="checkbox"/> Remove	CHAPTER 2 PAGE 2-25
<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	CLEAN COPY - CHAPTER 2 PAGE 2-25
<input type="checkbox"/> Add	<input type="checkbox"/> Replace	<input checked="" type="checkbox"/> Remove	CHAPTER 2 PAGE 2-26
<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	CLEAN COPY - CHAPTER 2 PAGE 2-26
<input type="checkbox"/> Add	<input type="checkbox"/> Replace	<input checked="" type="checkbox"/> Remove	CHAPTER 2 PAGE 2-27
<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	CLEAN COPY - CHAPTER 2 PAGE 2-27
<input type="checkbox"/> Add	<input type="checkbox"/> Replace	<input checked="" type="checkbox"/> Remove	CHAPTER 2 PAGE 2-28
<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	CLEAN COPY - CHAPTER 2 PAGE 2-28
<input type="checkbox"/> Add	<input type="checkbox"/> Replace	<input checked="" type="checkbox"/> Remove	APPENDIX R PAGE 10
<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	CLEAN COPY - APPENDIX R PAGE 10
<input checked="" type="checkbox"/> Add	<input type="checkbox"/> Replace	<input type="checkbox"/> Remove	PLATE 13A - NEW TOPSOIL PILE "A-1" (INSITU)
<input checked="" type="checkbox"/> Add	<input type="checkbox"/> Replace	<input type="checkbox"/> Remove	DRAWING "2014 MECHANICAL TREATMENT & SEEDING AREA" TO ADDENDUM
<input type="checkbox"/> Add	<input type="checkbox"/> Replace	<input type="checkbox"/> Remove	TO APPENDIX P
<input type="checkbox"/> Add	<input type="checkbox"/> Replace	<input checked="" type="checkbox"/> Remove	PLATE 1 SURFACE FACILITY MAP
<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	PLATE 1 EXISTING SURFACE FACILITY MAP
<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	PAGE 1 APPENDIX B PART D - RECLAMATION COST EST. REVISED MARCH 2014
<input type="checkbox"/> Add	<input type="checkbox"/> Replace	<input checked="" type="checkbox"/> Remove	ADDENDUM TO APPENDIX P - RESPONSE TO DIVISION NOV #10132
<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	CLEAN COPY ADDENDUM TO APPENDIX P

Any other specific or special instruction required for insertion of this proposal into the Mining and Reclamation Plan.

Received by Oil, Gas & Mining

## APPLICATION FOR COAL PERMIT PROCESSING

Permit Change  New Permit  Renewal  Exploration  Bond Release  Transfer

**Permittee:** INTERMOUNTAIN POWER AGENCY

**Mine:** WILDCAT LOADOUT

**Permit Number:**

C/007/0030

**Title:** RESPONSE TO TASK ID #4577 - CLEAN COPIES

**Description,** Include reason for application and timing required to implement:

**Instructions:** If you answer yes to any of the first eight questions, this application may require Public Notice publication.

- |   |  |  |
|---|--|--|
| <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No            | 1. Change in the size of the Permit Area? Acres: <u>6.83</u> Disturbed Area: <u>6.83</u> <input checked="" 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 the application include operations outside a previously identified Cumulative Hydrologic Impact Area?  |
| <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> No | 4. Does the application include operations in hydrologic basins other than as currently approved?  |
| <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> No | 5. Does the 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 checked="" type="checkbox"/> Yes | <input type="checkbox"/> No            | 9. Is the application submitted as a result of a Violation? NOV # <u>10132</u>   |
| <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> No | 10. Is the application submitted as a result of other laws or regulations or policies?<br><i>Explain:</i> _____  |
| <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 the 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 checked="" type="checkbox"/> Yes | <input 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 calculation?  |
| <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?  |
| <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> No | 22. Does the 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?  |
| <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> No | 24. Does the application include confidential information and is it clearly marked and separated in the plan?  |

**Please attach three (3) review copies of the application. If the mine is on or adjacent to Forest Service land please submit four (4) copies, thank you.** (These numbers include a copy for the Price Field Office)

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.

<u>JAMES HEWLETT</u>	<u>RESIDENT AGENT</u>	<u>5-19-14</u>	
Print Name	Position	Date	Signature (Right-click above choose certify then have notary sign below)

Subscribed and sworn to before me this 19 day of May, 2014

Notary Public: Michelle R. Miller, state of Utah.

My commission Expires: 8/30/2015

Commission Number: 613249 ss:

Address: 10655 S. Riverfront Parkway Suite 130

City: South Jordan State: UT Zip: 84095

<p><b>For Office Use Only:</b></p>	<p><b>Assigned Tracking Number:</b></p>	<p><b>Received by Oil, Gas &amp; Mining</b></p>
------------------------------------	---	---

test plots, including the newest plot will be analyzed for: soil color, texture, pH, organic carbon, saturation percentage, alkalinity, electrical conductivity, calcium carbonate percentage, sodium absorption ratio, soluble potassium, magnesium, calcium, sodium, total nitrogen, available phosphorous, available water capacity, and percent rock fragments. The results can be found in Appendix N. Once any of the areas of substitute material have been determined suitable for reclamation, all or part of these areas will be carefully outlined on Plate 1 and the volumes necessary to make up the current topsoil deficit, will be included in the Topsoil Pile Summary. This will require approximately 31,954 additional cubic yards of material.

Prior to final reclamation, samples will be taken of the stored topsoil to determine any deficiencies which would affect the growth of newly revegetated areas. Any deficiencies will be corrected by adding to the soil chemical fertilizers, organic mulch, or any other substances recommended by the regulatory authority. Preparation techniques such as discing will be incorporated.

#### Species and Amounts of Seeds and Seedlings

A reference area has been established by Andalex and DOGM. The sagebrush/grass reference area was used in combination with a vegetation inventory to determine the final seed mixture and amounts of seed to be used for final reclamation.

The following seed mixture, was developed by Mt. Nebo Scientific in conjunction with the vegetation inventory and UDOGM comments.

#### Planting and Seeding Methods

All reclaimed areas will be stabilized by gouging-grading to contour prior to reseeding. ~~The gouging will be done with a backhoe or trackhoe, and will consist of gouges at least 18" deep by 24" - 36" wide, spaced 6' - 10' apart.~~ All areas graded on the contour will then be ~~hydroseeded~~ followed by drill seeding and crimping-in 1 ton/ac of hay or straw mulch with the drill seeding.

~~hydromulched.~~

### Mulching Techniques

Vegetative cover will be promptly re-established following cessation of mining activities to stabilize erosion. Re-seeding will occur during the first normal period for favorable growth following regrading. Mulch will be applied to all reseeded areas. Areas which are hydromulched will be done so using an organic type mulch at the rate of one ton per acre. Where hydroseeding and hydromulching occur, a tackifier will be added to both the seed and the mulch.

Mulch will be used wherever seeds are planted. All disturbed areas will be reseeded. These areas are shown on Plate 1B and constitute 88.62 acres. (Not including the Utah Railway tracks).

**R645-301-200.            SOILS**

*HISTORICAL NOTE: In 2004, the Division issued an Order DO-04 for wind-blown fines which had accumulated outside the disturbed area, primarily in the area southwest of the main coal storage pile below sediment Pond B. A complete description of the mitigation plan proposed for DO-04 is included in Appendix P.*

*An Addendum to Appendix P has been included to reflect actions taken to mitigate NOV No. 10132 issued on November 26, 2013, which includes defining 6.83 acres of previously undisturbed area as disturbed area. The Division's soil scientist, Priscilla Burton, suggested and Division management concurred that protection of the topsoil resource "insitu" was preferable to salvage and storage of topsoil, based on a lack of immediate need for expansion, limited activity foreseen at the site, and the historic difficulty in revegetation of topsoil stockpiles in this climate. This 6.83 acre area was included in the 2003 soil survey. (Refer to Appendix D)*

I. Soil Survey and Vegetation Inventory (please see Appendix D, Appendix D Supplement, and Appendix I).

1. Introduction

Appendix D is a survey conducted by the SCS in the Wildcat area and depicts the major soil types here. Appendix D also includes a survey including sampling as performed by Earl Jensen consulting as a soil scientist. Included in this survey is a soil profile description for each soil type identified on the permit area. Plate 11 depicts the soils as outlined by the Order 3 Survey performed by the SCS.

**R645-301-211.            PREMINING SOIL RESOURCES**

The entire disturbed area, with the exception of approximately 20 acres, was disturbed pre-law by previous owners, and no topsoil was saved.

Topsoil was removed prior to construction in 1984, and stored and protected for use in final reclamation. Please see Plate 13C for a summary of stored topsoil. Appendix D also includes a topsoil mass balance and includes soil quality data from the Utah State University Testing Laboratory. The mass balance indicates that there may not be sufficient volume of topsoil for final reclamation. IPA has committed to identifying and testing for suitable substitute material either off the permit area or possibly within

twelve inches and placed on the new topsoil storage pile on the west side.

\*\* It should also be noted that, under the plan to address the Division Order DO-04 (wind-blown fines), the company commits to salvaging 6" of topsoil from the clean-up area shown on Plate 1A. It is estimated that about 3000 cubic yards of material will be salvaged at that time. The material will be stored as an extension to existing Topsoil Pile A which is located nearby. For a complete description of the topsoil salvaging and stockpiling plan associated with Division Order DO-04, refer to Appendix P.

In March of 2014, coal fine accumulations greater than 4" in the 6.83 acre area were mechanically removed and the area seeded. At such time as the fines reach 4" or greater in depth, this operation will be repeated.

Backfilling, Grading, and Soil Replacement and Stabilization  
(Also R645-301-232.400)

All disturbed areas will be backfilled and graded to as near as possible the approximate original contour with the exception of the natural drainage which came through the loadout site prior to Swisher Coal Company's establishment of their loadout facility. Andalex has diverted this natural drainage and IPA will provide permanent protection of this diversion once reclamation is complete. Please refer to Appendix R, re Undisturbed Diversions for more detail. Slopes shall not exceed the angle of repose or such lesser slopes as required by the regulatory authority to maintain stability. Fill material will be compacted to assure stability. This is a flat lying area and therefore stabilization should be achieved easily.

Areas which will be backfilled include foundation areas such as the loadout, the reclaim tunnels (including the expanded reclaim system), and the truck dumps. All backfilled and regraded areas, including the Wildcat Expansion areas, will be reclaimed. Areas to be regraded include the loadout site, stockpile sites, and roads. These areas can all be regraded simultaneously because of the simple topography of the

area. Where possible, all final grading and placement of topsoil will be done along the contour to minimize erosion.

In all cases, grading will be conducted in a manner which minimizes erosion and provides a stable surface for the placement of topsoils.

Upon reclamation, topsoil will be hauled to the area by end dump trucks, piled and spread using a grader. Where possible, the soil will be distributed along the contour. The thickness of the re-established soil will be consistent with soils in the vicinity and will be sufficient to support vegetation equal to or superior to pre-mining history. As previously mentioned, Andalex was unable to gather topsoil because of the previous disturbance. However, IPA has committed to identifying and testing topsoil substitute areas either within or outside of the permit area as needed so that

upon final reclamation, the entire disturbed area of approximately 88.62 acres can be resurfaced with six inches of topsoil or less if allowed by the Division (please see Plate 1 for the location of these topsoil substitute areas. They are identified on Plate 1 as revegetation test plots.) Existing topsoil piles on site total approximately 464,499 cubic feet (17,204 cubic yards) of material. IPA feels and it is apparent from the soils inventory, that much of the fill material used onsite could be used as topsoil substitute. As previously mentioned, four topsoil substitute areas have been identified and are shown on Plate 1. Soil samples from these locations have been analyzed and the results are included in Appendix N. Once it has been determined that the substitute material is suitable for reclamation purposes, the actual area of substitute material will be carefully outlined on Plate 1 and the volumes included in the Topsoil Pile Summary. These areas have been protected from wind and water erosion through revegetation using the currently approved seed mixture. Please refer to Appendix D for the specific methods for this

Note: Refer to Plate 14 for cross-section locations.

At the request of the Division, no extraordinary compaction will be applied to the last few lifts during the recontouring/grading, to provide a relatively loose rooting zone of four feet. This loose application of fill will eliminate the need for ripping prior to topsoil placement. During this operation, if it is determined that additional sediment control measures are needed for the diversions leading to the four ponds, they will be put in at this time. These measures might include rock check dams or straw dikes.

The next steps in Phase I will not take place until the fall of whatever year we are in at this point. So far the project has taken 14 to 15 months. The next two steps in the process are topsoil redistribution, where additional substitute will be hauled in if necessary, and revegetation. Once the topsoil is spread, the area will be graded on the contour, followed by drill seeding and crimping-in 1 ton/acre of hay or straw mulch. The entire revegetation procedure is described in this chapter.

Finally in Phase I, monitoring will commence. Observations of revegetation success and slope stability will be observed. If any part of this is unsuccessful, corrective measures will be taken.

Since IPA estimates a minimum of two years before vegetation has taken hold to prevent erosion, then the entire Phase I project will take at least 3-1/2 years.

## Phase II

Phase II of the reclamation will commence as soon as the monitoring of Phase I allows.

All that is left at this point is the removal (recontouring) of Ponds A, C, and D and the removal of the field fence surrounding the permit area. Once the

test plots, including the newest plot will be analyzed for: soil color, texture, pH, organic carbon, saturation percentage, alkalinity, electrical conductivity, calcium carbonate percentage, sodium absorption ratio, soluble potassium, magnesium, calcium, sodium, total nitrogen, available phosphorous, available water capacity, and percent rock fragments. The results can be found in Appendix N. Once any of the areas of substitute material have been determined suitable for reclamation, all or part of these areas will be carefully outlined on Plate 1 and the volumes necessary to make up the current topsoil deficit, will be included in the Topsoil Pile Summary. This will require approximately 31,954 additional cubic yards of material.

Prior to final reclamation, samples will be taken of the stored topsoil to determine any deficiencies which would affect the growth of newly revegetated areas. Any deficiencies will be corrected by adding to the soil chemical fertilizers, organic mulch, or any other substances recommended by the regulatory authority. Preparation techniques such as discing will be incorporated.

#### Species and Amounts of Seeds and Seedlings

A reference area has been established by Andalex and DOGM. The sagebrush/grass reference area was used in combination with a vegetation inventory to determine the final seed mixture and amounts of seed to be used for final reclamation.

The following seed mixture, was developed by Mt. Nebo Scientific in conjunction with the vegetation inventory and UDOGM comments.

#### Planting and Seeding Methods

All reclaimed areas will be stabilized by grading to contour prior to reseeding. All areas graded on the contour will then be followed by drill seeding and crimping-in 1 ton/ac of hay or straw mulch with the drill seeding.

## Mulching Techniques

Vegetative cover will be promptly re-established following cessation of mining activities to stabilize erosion. Re-seeding will occur during the first normal period for favorable growth following regrading. Mulch will be applied to all reseeded areas. Areas which are hydromulched will be done so using an organic type mulch at the rate of one ton per acre. Where hydroseeding and hydromulching occur, a tackifier will be added to both the seed and the mulch.

Mulch will be used wherever seeds are planted. All disturbed areas will be reseeded. These areas are shown on Plate 1B and constitute 88.62 acres. (Not including the Utah Railway tracks).

Wildcat Loadout Final Seed Mixture			
Scientific Name	Common Name	#PLS/Acre	PLS/ft <sup>2</sup>
<i>Ephedra viridis</i>	Green Mormon tea	1.75	1.0
<i>Artemisia tridentata</i> var. <i>wyomingensis</i>	Wyoming Big sagebrush	0.02	1.0
<i>Ceratoides lanata</i>	Winterfat	1.25	1.5
<i>Artemisia nova</i>	Black sage	0.5	1.0
<i>Atriplex gardneri</i>	Gardner saltbush	0.4	1.0
<i>Archillea millefolium</i>	Yarrow	0.09	0.2
<i>Hedysatum boreale</i>	Northern sweetvetch	0.2	0.2
<i>Sphaeralcea ambigua</i>	Desert globemallow	0.6	1.0
<i>Penstemon palmeri</i>	Palmer penstemon	0.4	0.5
<i>Heliomeris multiflora</i>	Showy goldeneye	0.04	1.0
<i>Castilleja applegatei</i>	Early Indian paintbrush	0.01	1.0
<i>Oenothera speciosa</i>	Showy evening Primrose	0.02	1.0
<i>Bouteloua gracilis</i>	Blue grama	0.13	2.5
<i>Pascopyrum smithii</i>	Western wheatgrass	1.0	2.5
<i>Elymus trachycaulus</i>	Slender wheatgrass	0.7	2.5
<i>Pleuraphis jamesii</i>	Galleta	2.5	5.0
<i>Hesperostipa comata</i> ssp. <i>comata</i>	Needle-and-thread grass	1.4	5.0
<i>Achnatherum hymenoides</i>	Indian ricegrass	1.6	5.0
<i>Sporobolus cryptandrus</i>	Sand dropseed	0.04	5.0
TOTALS		12.65	37.9

**Interim Mix for broadcast seeding at Wildcat Loadout**

<u>Scientific Name</u>	<u>Common Name</u>	<u>PLS/ft<sup>2</sup></u>	<u># PLS/acre</u>
1) <b><u>FORBS</u></b> (Choose two species from the list below to arrive at 7 PLS/ft <sup>2</sup> )			
<i>Achillea millefolium var. occidentalis</i>	Western yarrow	3.5	0.09
<i>Sphaeralcea ambigua</i>	Desert globemallow	3.5	0.3
<i>Castilleja applegatei ssp. martinii</i>	Early Indian paintbrush	3.5	0.03
<i>Baileya multiradiata</i>	Desert marigold	3.5	0.14
<i>Oenothera speciosa</i>	Showy evening primrose	3.5	0.06
<i>Heliomeris multiflora</i>	Showy goldeneye	3.5	0.15
Sub TOTAL for FORBS		<b><u>7.0</u></b>	
2) <b><u>Cold Season GRASSES</u></b> (Choose two cold season species from the list below to arrive at 10 PLS/ft <sup>2</sup> )			
<i>Pascopyrum smithii</i>	Western wheatgrass	5.0	2.0
<i>Achnatherum hymenoides</i>	Indian ricegrass	5.0	1.6
<i>Bromus anomalus</i>	Nodding brome	5.0	1.5
<i>Elymus lanceolatus</i>	Thickspike wheatgrass	5.0	1.4
<i>Elymus trachycaulus</i>	Slender wheatgrass	5.0	1.4
<i>Hesperostipa comata</i>	Needle & thread grass	5.0	1.8
Sub TOTAL for COLD SEASON GRASSES		<b><u>10.0</u></b>	

Continued next page

Table continued from previous page

<u>Scientific Name</u>	<u>Common Name</u>	<u>PLS/ft<sup>2</sup></u>	<u># PLS/acre</u>
<b>3) Warm Season GRASSES</b> (Choose two warm season species to arrive at 10 PLS/ft <sup>2</sup> )			
<i>Aristida pupurea</i>	Purple threeawn	5.0	0.87
<i>Bouteloua gracilis</i>	Blue grama	5.0	0.26
<i>Eragrostis trichodes</i>	Sand lovegrass	5.0	0.15
<i>Pleuraphis jamesii</i>	Galleta grass	5.0	1.4
<i>Sporobolus airoides</i>	Alkali sacaton	5.0	0.12
<i>Sporobolus cryptandrus</i>	Sand drop seed	5.0	0.04
<b>Sub TOTAL Warm Season GRASSES</b>		<u>10.0</u>	
<b>TOTAL Forbs and Grasses (warm &amp; cold season) for Interim mix</b>		<u>27.0</u>	

Management Practices, e.g., Irrigation, Pest, and Disease Control

No mechanical irrigation will be used because of the lack of water in the area. Vegetative growth will be subject to normal rainfall and winter snowfall. Vegetation will be protected from both wildlife and livestock by drift-fences until the reclaimed areas have been adequately re-established. Upon approval, the fences will be removed. Fences are already standing surrounding the permit area. Pesticides and herbicides will be used as necessary. Should any persistent pesticides be needed, the Division's approval will be obtained prior to their use.

Measures to Determine Success

Revegetation will be closely monitored. Areas which fail to support sufficient growth to stabilize conditions will be tested and reseeded until a proper cover is established.

## **2.11 Alternate Sediment Control Areas (ASCA)**

There will be 8 Alternate Sediment Control Areas (ASCA) remaining on this site. The ASCA designations are ASCA-1, ASCA-2, ASCA-3, ASCA-4, ASCA-5, ASCA-6, ASCA-7 and ASCA-8. Only areas not able to be drained to sediment ponds are included as ASCA=s. All ASCA=s are existing, except ASCA-8, which will be added for the outslope of new Sediment Pond “G”.

A temporary ASCA has been created in the northernmost area of the proposed disturbed area by the utilization of excelsior logs as treatment, to prevent any coal fines from entering into the wash that enters the permit area from the west. It is the operators intent that, upon approval of the 6.83 acre disturbed area addition, an application will be submitted immediately to expand the existing permit boundary by 22 acres, and defining this addition as disturbed area. Pursuant to that submittal, a larger ASCA is proposed for the northern drainage as well as 2-3 other ASCA=s to control sediment.

The following are descriptions of each of the ASCA=s and methods of treatment:

**ASCA-1** - This is the area west of the railroad right-of-way and scale house access road. The area is approximately 0.76 acres and is treated for sediment control by vegetation.

**ASCA-2** - This is an existing ASCA area on the outslope east of Sediment Pond E. The area is approximately 0.15 acres and is treated by vegetation.

**ASCA-3** - This is an area north of new Sediment Pond@G@, and includes the area proposed for vacuum cleaning. The area is approximately 2.32 acres and is treated for sediment by straw bales and vegetation.

**ASCA-4** - This is the area surrounding Sediment Pond AA@ and including Topsoil Storage Pile A. This is an area of approximately 2.73 acres and is treated by straw bales and vegetation.

**ASCA-5** - This is the area south and west of Topsoil Storage Piles E and B, including those piles. The area is approximately 1.71 acres, and is treated by a combination of berms, straw bales and vegetation.

**ASCA-6** - This is an area southeast of the train loading facility along the Disturbed Area boundary. It is approximately 1.08 acres and is treated by vegetation.

**ASCA-7** - This is Topsoil Storage Pile F. It is approximately 0.30 acres and is treated by a berm and vegetation.

**ASCA-8** - This will be a new ASCA located on the outslope of new Sediment Pond G. It will have an area of approximately 0.27 acres, and will be treated by vegetation

Add 6.83 Acres of Disturbance  
 Wildcat Loadout / C/007/033  
 NOV10132  
 March 4, 2014

Reclamation Cost Estimate  
 Required Bond Amount

Addition Bond Cost  
 March 4, 2014

Direct Costs

Subtotal Demolition and Removal	\$212,052.00
Subtotal Backfilling and Grading	\$220,847.00
Subtotal Revegetation	\$372,984.00
Direct Costs	\$805,883.00

Indirect Costs

Mob/Demob	\$80,588.00	10.0%
Contingency	\$40,264.00	5.0%
Engineering Redesign	\$20,132.00	2.5%
Main Office Expense	\$54,800.00	6.8%
Project Management Fee	\$20,132.00	2.5%
Subtotal Indirect Costs	\$215,916.00	26.8%

Total Cost 2011 Dollars \$1,021,799.00

Number of Years (2016 is next midterm review) 3  
 Escalation Factor for 2014 / 1.9 % 1.058  
 Escalation \$59,264.00

Total Cost Escalated to 2014 \$1,081,063.00

Number of years 2  
 Escalation Factor / Use 2014 factor of 1.9 % 1.038  
 Escalation \$41,080.00  
 Escalated Reclamation Cost to 2016 \$1,122,143.00  
 Bond Amount (rounded to nearest \$1,000) \$1,122,000.00  
 Posted Bond 2009 \$1,144,000.00  
 Difference Between Cost Estimate and Bond \$22,000.00  
 Percent Difference 1.90%

# ADDENDUM TO APPENDIX P

## RESPONSE TO DIVISION NOV #10132

### COAL FINES ACCUMULATIONS

#### CONTENTS:

- 1) NARRATIVE
- 2) FIGURE, COAL FINES ACCUMULATION OVER 4" MAP

On November 26, 2013, Division Citation NOV #10132 was issued for coal fine accumulations in both undisturbed areas within the current permit area as well as outside the approved permit area. After several meetings and discussions with the Permittee (IPA), the Operator (Wild West Equipment & Hauling), and UDOGM personnel, the following courses of action were agreed upon to mitigate the NOV:

Clean up of accumulations in the areas cited in the NOV and areas where coal fine accumulations are greater than 4" in depth. Refer to Figure 1 "Coal Fines over 4" Map". This will be accomplished by the use of mechanical equipment and the topsoil will remain in place as recommended by Priscilla Burton of the Price UDOGM Field Office. Any sediment controls (straw bales, excelsior logs, etc.) damaged or removed for the clean up will be replaced and additional sediment controls added as needed. The areas will then be reseeded with the Interim seed mix as described in Chapter 4, Pages 3-23 & 3-24 of the MRP, with the exception of the exclusion of Triticale from the cold season grasses as Ms. Burton indicated this particular species did not perform well in the area.

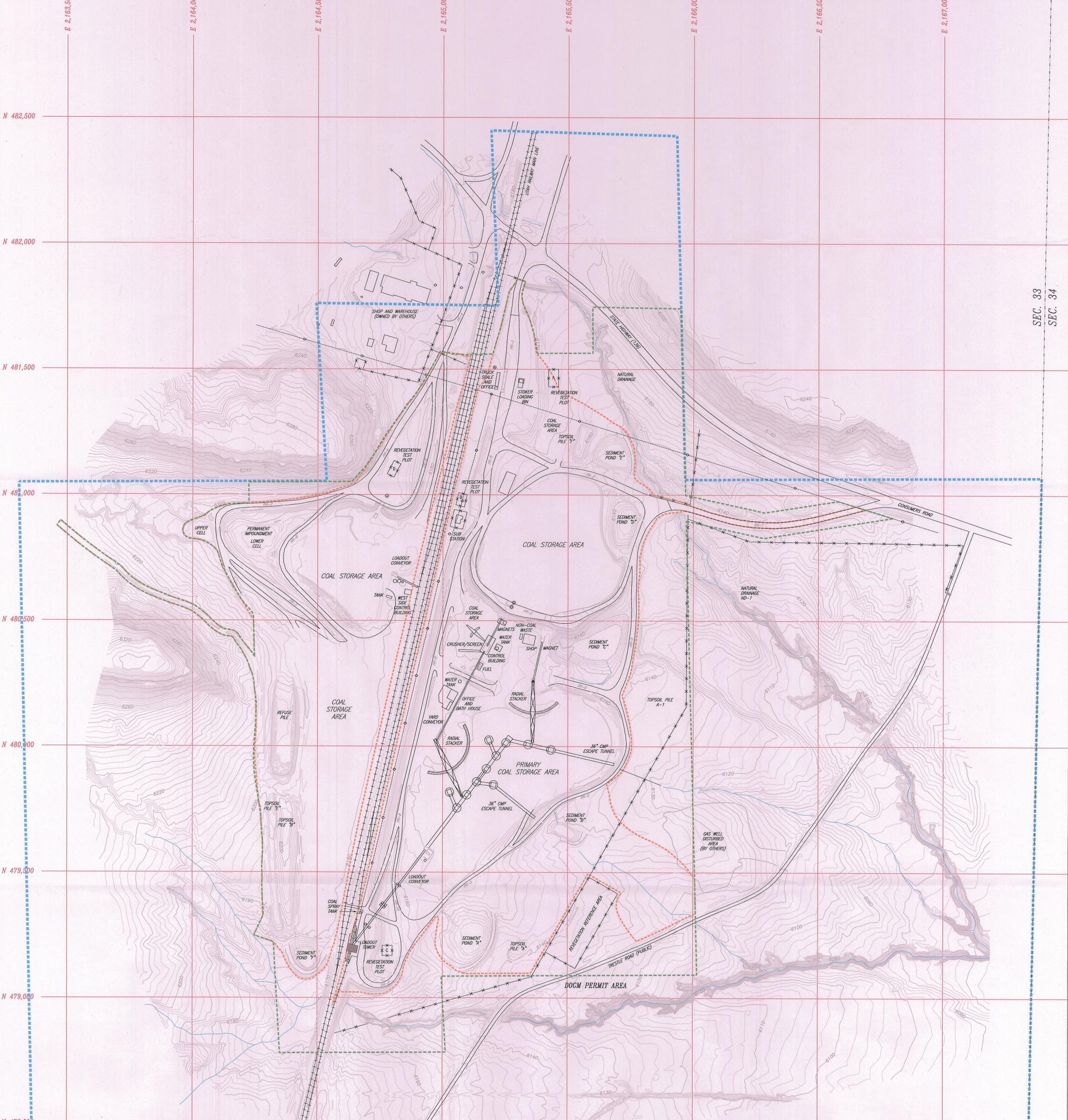
The previously 6.83 acres defined as undisturbed area within the current Permit boundary will be designated as disturbed area as indicated on Plate 1, and monitored regularly for coal fine accumulations.

Extend the existing snow/drift fence approximately 600 feet to the North along PR-5 to reduce the accumulations of wind blown fines in the newly defined disturbed area. Additional snow/drift fences have also been installed along the east edge of the coal pad above PR-5 and along the eastern edge of the new Topsoil Pile "A-1".

Grade/blade the road surface of PR-5 occasionally to reduce dusty conditions in addition to watering.

A revised Reclamation Cost Estimate summary escalated to 2014 dollars has also been completed to include the additional 6.83 acres to be defined as disturbed area which includes an adjustment of \$24,147 for reclamation costs. The current bond amount is sufficient to cover this addition so no additional bonding is required at this time.

Additionally, IPA intends to submit significant revisions to the MRP in the near future, to expand the Permit boundary and designate this expansion as disturbed area, including the possible addition of more sediment controls, potential additional ASCA's, additional control of drop points on stacker conveyors, additional monitoring locations, and other measures to ensure that these accumulations will be controlled and managed as effectively and efficiently as possible.

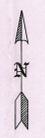


SEC. 33  
SEC. 34

T13S, R9E, SEC. 33  
T14S, R9E, SEC. 4

BLM RIGHT-OF-WAY (U-48027)

- LEGEND**
- EXISTING BLM RIGHT OF WAY (U-48027)
  - DOGM PERMIT BOUNDARY
  - EXISTING DISTURBED AREA BOUNDARY (88.62 ACRES)



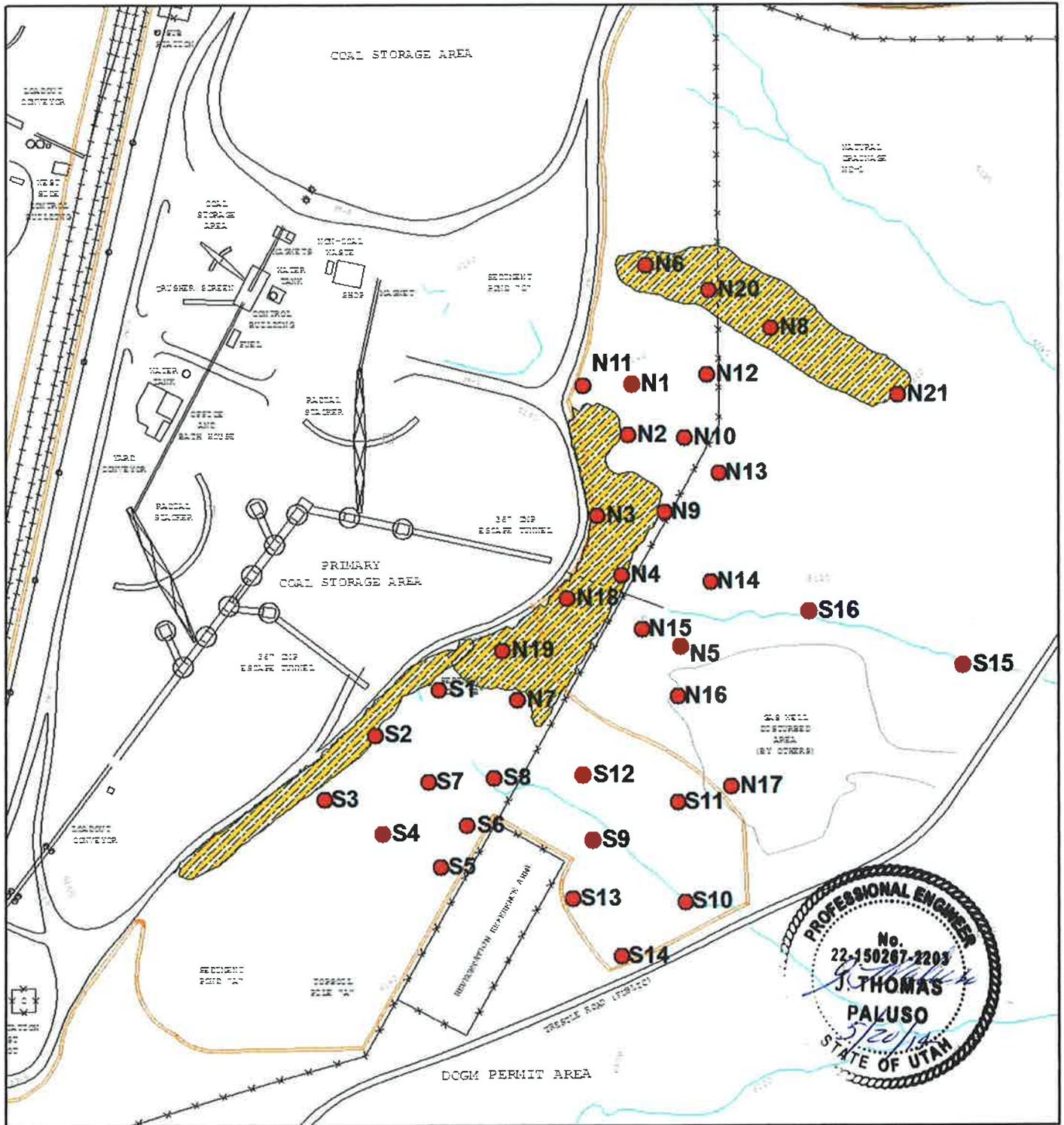
# INTERMOUNTAIN POWER AGENCY

WILDCAT LOADOUT - C/007/0030  
EXISTING SURFACE FACILITY MAP

CONTOUR INTERVAL - 2'  
PHOTOGRAPHY DATE: 10/22/2006

REVISION NUMBER: 7	SCALE: 1" = 150'
PROPOSED DISTURBED AREA EXPANSION	DATE: MAY 2014
<b>PLATE 1</b>	

# WILDCAT LOADOUT



 2014 Mechanical Treatment & Seeding Area    ● Random Photograph Sites

**Environmental Industrial Services**  
 Environmental & Engineering Consulting

31 North Main Street  
 Helper, Utah 81528  
 Office: (435) 492-3514  
 Fax: (435) 472-8780  
 E-Mail: [info@precise.com](mailto:info@precise.com)  
[www.jthomas.com](http://www.jthomas.com)

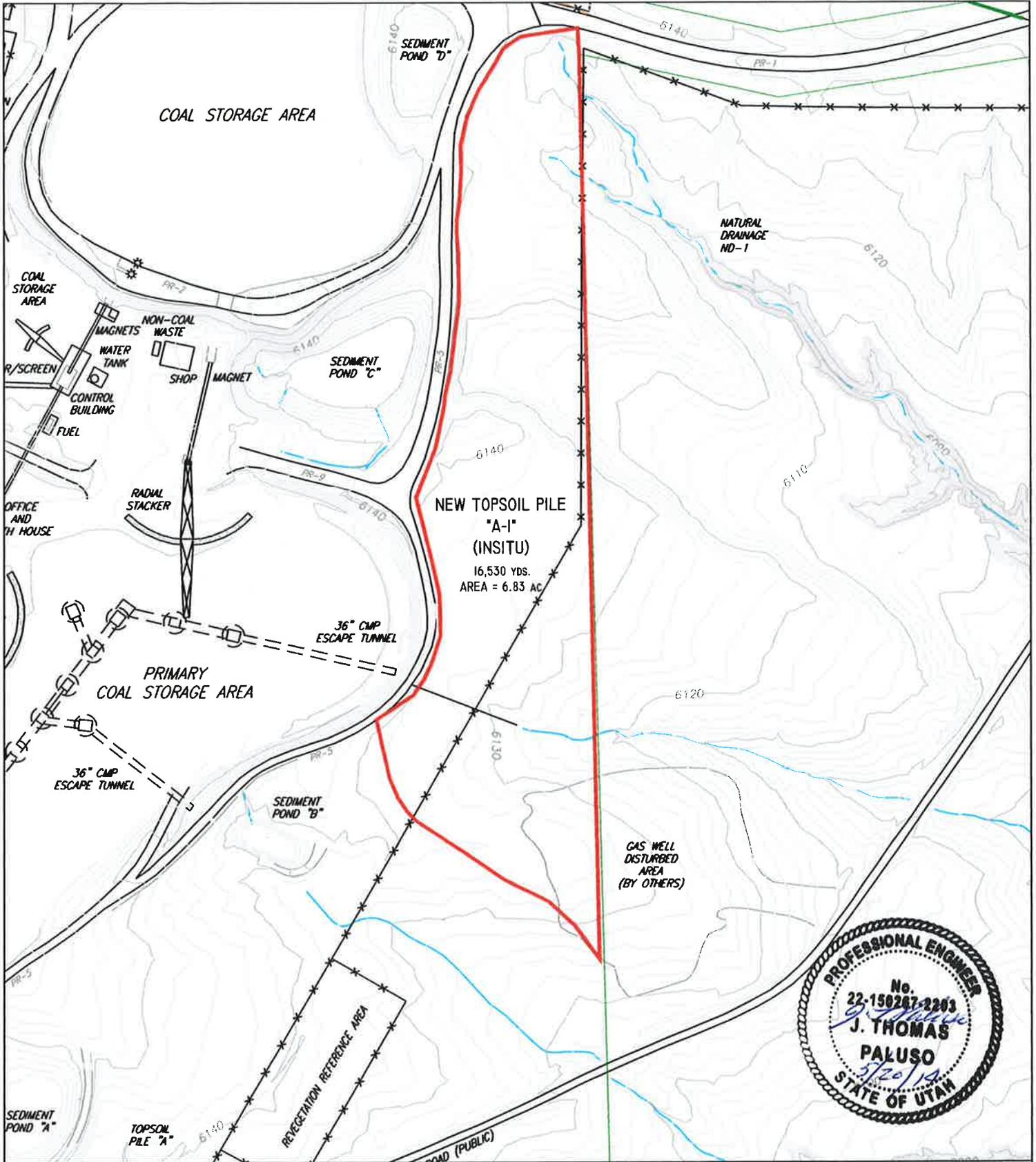
Feet

0 110 220 330

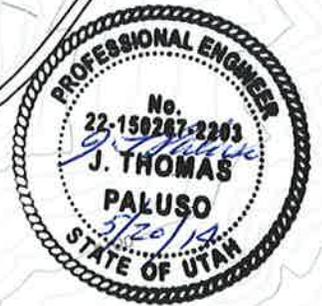
N



**2014 Mechanical Treatment & Seeding Area**



**NEW TOPSOIL PILE  
"A-1"  
(INSITU)**  
16,530 YDS.  
AREA = 6.83 AC



**LEGEND**

- DOGM PERMIT BOUNDARY
- NEW TOPSOIL PILE "A-1" (INSITU) 6.83 ACRES



**INTERMOUNTAIN  
POWER AGENCY**

WILDCAT LOADOUT - C/007/0030  
NEW TOPSOIL PILE "A-1" (INSITU)

REVISION NUMBER:	SCALE:
PROPOSED DISTURBED AREA EXPANSION	1" = 200'
DATE:	APRIL 6, 2014
<b>PLATE 13A</b>	