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# State of Utah

DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF OIL, GAS AND MINING

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November 10, 1992

TO: Pamela Grubaugh-Littig, Permit Supervisor

FROM: Susan M. White, Senior Reclamation Biologist *SMW*

RE: Technical Deficiencies, Sunnyside Cogeneration Associates,  
Sunnyside Refuse Pile, PRO/007/035, Folder #2, Carbon County, Utah

## SYNOPSIS

Sunnyside Cogeneration Associates submitted a response to completeness issues. This memo will review that response.

## ANALYSIS

Editorial comments are as follow:

1. On page 300-14, Pinstemon is spelled Penstemon and Cercocarpus is spelled Cercocarpus.
2. On page 300-5, slina is spelled salina and bymenoides is spelled hymenoides.
3. On page 300-16, no interim seed mixture is found on page 17 as referenced.
4. Why is the first paragraph of page 300-21 included in the text, this does not relate to anything.

The following deficiencies are mostly general in nature since minimal specifics were provided to the Division to comment on. Also, most of the comments concerning the reference areas and success standards will be presented after the site visit with Eckhoff, Watson, and Preator, Mt. Nebo Scientific, and the Division. However, the applicant is advised that prior to permit approval, sampling

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and success standards will be stated in the text as if they had been done. Generalities will not be accepted.

The applicant is instructed to remove repetitive comments and paragraphs and compile similar sections into one area of the text. These repetitive sections contain conflicting statements. When this is done, R645-301-340., Reclamation Plan, will be reviewed.

R645-301-321.100.

No description of the Atriplex/grass or the macrophytic community is provided.

R645-301-321.200.

Estimates of productivity for each of the three communities must be provided prior to permit approval.

R645-301-323.400.

Plate 3-1 does not clearly delineate each vegetation type. The map must also show all vegetation contiguous to the permit area.

A vegetation map should be provided which estimates the extent of each of the three vegetation types which were expected to have occurred on site. These should probably be designated on a post mining topography map.

R645-301-322.

The permit states "few occurrences of Fish and Wildlife have been observed within the SCA Permit Area". Please provide a reference for this statement.

R645-301-322.210.

Please provide a reference for who determined that no endangered or threatened species occur within the permit area.

R645-301-331.

Please provide greater detail for interim seeding. Explain when and under what conditions interim seeding will be done and what methods of seeding will be used.

R645-301-341.100.

Please provide a schedule for the completion of each major step in the revegetation plan. This is to include seed ordering, implementation, repairs, and inspection.

R645-301-341.210.

Elymus salina is the wildrye indigenous to the site and should be used in lieu of Elymus cinereus. This will require a commitment of advance seed ordering to allow the seed company to collect the seed.

The seeding rates for Winterfat, Ephedra, and Cliff Rose are very low and should be increase to at least a half pound PLS per acre.

Please specify which subspecies of Artemisia tridentata, big sagebrush (not bug) will be used in the seed mix.

No seed mixture was found for the Sagebrush/grass or Atriplex/grass community.

R645-301-342.100.

The current plan does not include enhancement measures for wildlife. Seeding or planting is just reestablishing the previous existing vegetation. Please propose detailed enhancement techniques such as guzzlers, rock piles, etc. or explain why enhancement is not practicable.

R645-301-352.

\* Contemporaneous reclamation or permanent reclamation will occur as areas become available. The applicant must define a schedule for contemporaneous reclamation. The schedule may include criteria for reclamation

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such as: when more than two acres are available that will not be redisturbed, the area will be reclaim in accordance with the approved plan.

R645-301-353.110.

Please provide a measure of diversity for revegetation success.

RECOMMENDATION

The above noted deficiencies must be addressed prior to permit approval. As noted above, this is not a complete deficiency document.

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SCA.TD