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JIM

MAR 16 1982

UTAH POWER & LIGHT COMPANY

1407 WEST NORTH TEMPLE STREET
P. O. BOX 899
SALT LAKE CITY, UTAH 84110

March 16, 1982

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Mr. Jim Smith
Coordinator of Mined Land Development
Department of Natural Resources
Division of Oil, Gas and Mining
4241 State Office Building
Salt Lake City, Utah 84114

Dear Mr. Smith:

On September 28, 1981, Utah Power & Light Company received a letter from the Division approving an off-site waste rock disposal area. Approval was contingent on meeting certain stipulations before actual development work can begin.

The following narratives should suffice the stipulated additional requirements.

Stipulation 9-25-1

Utah Power & Light Company acknowledges all terms and conditions of the Bureau of Land Management's amended right-of-way U-37642 and assumes the responsibilities of legal leaseholder.

Stipulation 9-25-2

A.783.19 - Vegetation Resources:

Under a Bureau of Land Management right-of-way grant the area of consideration was originally intended for a coal storage yard which was later abandoned in favor of a closed silo storage at the mine site. Initially the land was cleared and graded to accommodate parking and material storage during the construction of the Wilberg Mine.

As an off-site area under jurisdiction of the Bureau of Land Management, we are faced with compliance of both regulatory agencies. Special Stipulation 19 of the revised Right-of-Way Grant states that prior to rehabilitation (final reclamation), the Bureau, in conjunction with the Division, shall determine the seed mixture at the time of final reclamation.

Obviously, the Bureau feels by waiting, land use and wildlife effects may change or be enhanced. Nevertheless, in keeping with U.M.C. regulations, we are submitting the vegetation study for the Wilberg Mine reference area as completed by Mr. Barker, Utah State University, Institute for Land Rehabilitation.

We have chosen the Wilberg reference site as not only being the closest but the most representative of the three mines site study areas which are available.

B. 817.21 - Top Soil General Requirements:

As previously explained, the area was graded during initial construction phase of the Wilberg Mine. Applicant contends the soil horizons have been mixed by grading. Two soil samples have been taken of composite soil layers. Soil samples represent soils taken from the surface to a depth of 12 inches deep. Analysis shows the material as being adequate to sustain revegetation. A soil classification report (Jarvis) indicates a root zone of 18 inches deep overlying bedded cobble and rock.

Measures will be taken to place subsoil material first as foundation in constructing the retaining berms. Surface soils will be stripped prior to berm construction and used as a topping for final berm formation. Compaction rates will vary with depth of material forming berms; i.e., lower materials will be compacted more than the upper layer which provides the soil growth medium. Soil analyses are attached.

A. 784.13 - Reclamation:

On termination of mining, reclamation work will begin. Life of mining is anticipated to be thirty years hence.

UMC 817-103 grading and backfilling will be done as stated in the Waste Rock Disposal application.

Soil deficiencies will be assessed by analysis at the time of reclamation (see B.L.M. stipulations).

U.M.C.-817-112 Revegetation:

Plant species listed in the application are subject to final approval at the time of final reclamation by the B.L.M. To clarify the Division's question concerning forbs and shrubs identified in the application, we offer that planting rates will be 1000 plants per acre. This includes all seven species listed, or approximately 740 plants of each species per acre.

Plants will be nursery grown, containerized plants. All seeding will require certification of pure live seed at the time of purchase.

U.M.C. 817.113 - Revegetation Timing:

Reclamation work is anticipated to begin during the summer following termination of mining.

After backfilling and grading, soil testing and soil augmentation, seed bed preparation will begin. Surfaces shall be scarified and harrowed, fertilizer applied at the rate specified, and worked into the prepared bedding. Transplanting and seeding will immediately follow.

Mulching at the specified rate will be placed over the seeded areas. No crimping can be done as discing would injure the new transplanted stock. Mulching with locally bought straw will provide some volunteer grain to shelter early grasses.

Timing for all seeding, transplanting and mulching would be in late October to realize winter moisture. Two weeks are sufficient to complete the reseeding work outlined.

U.M.C. 817.115 - Revegetation Grazing:

Post-mining land use will be determined by the Bureau of Land Management. In the time frame of thirty years it is possible a change may occur affecting revegetation species. Presently, land use is wildlife and grazing.

U.M.C. 817.116 - Revegetation Standard for Success:

Situated in a semi-arid zone of approximately 12 inches of annual precipitation, revegetation is expected to require several repeat seedings to meet cover requirements.

Under present regulations revegetation will be monitored for at least ten years to insure extended bond coverage.

It must be noted, until the Bureau of Land Management decides which seed mixture best suits future land use, final reclamation reflects rhetorical expressions only to satisfy the regulations. Long-term planning best suits the B.L.M. thinking.

Sincerely,

C. E. Shingleton

C. E. Shingleton
Director of Services
Mining and Exploration

CES:bb:3328
Encl.