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STATE OF UTAH
NATURAL RESOURCES & ENERGY
Oil, Gas & Mining

Scott M. Matheson, Governor
Temple A. Reynolds, Executive Director
Cleon B. Feight, Division Director

4241 State Office Building • Salt Lake City, UT 84114 • 801-533-5771

March 24, 1982

Mr. Chris Shingleton
Director of Services
Mining and Exploration
Utah Power & Light Company
P. O. Box 899
Salt Lake City, Utah 84110

RE: Completion of Waste Rock
Disposal Site Stipulations
Des-Bee-Dove Mine
ACT/015/017
Wilberg Mine
ACT/015/018B
Emery County, Utah

Dear Chris:

The Division of Oil, Gas and Mining has completed the review of the stipulations attached to the September 28, 1981, approval for the Des-Bee-Dove and Wilberg mines Waste Rock Disposal Site.

Stipulation 9-25-1

Utah Power & Light Company has accepted the Bureau of Land Management stipulations for the special use permit.

Stipulation 9-25-2

A. 783.19 Vegetation Resources

The Division will accept the Wilberg Pinyon-Juniper Reference Area as a standard for comparison of revegetation success for the waste rock disposal area. Due to the prior disturbance of the area by chaining, as well as by construction activities for the Wilberg Mine (i.e., use as a parking area), it would be difficult to find another equitable area for comparison. However, it should be noted that woody plant density, the number of shrubs per unit area in particular, was not assessed during data collection in the Wilberg Pinyon-Juniper Reference Area. These data need to be collected, analyzed and submitted during the 1982 growing season in order that appropriate shrub stocking rates can be ascertained as per 817.116(B)(3)(iv). This deficiency in the original data collection, as well as other discrepancies, also applies to the reference areas at the Cottonwood Portal, Deer Creek Mine and Des-Bee-Dove Mine.

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B. 817.21 Topsoil: General Requirements

The Division finds the suitability analysis and protection measures for topsoil and subsoil adequate in addressing this stipulation.

Stipulation 9-25-3

A. 784.13 Reclamation Plan

It is still not clear how many forbs and shrubs of each species will be planted. As stated on page 2 in answer to this stipulation, an apparent miscalculation has been made: ". . . we offer that planting rates will be 1,000 plants per acre. This includes all seven species listed, or approximately 740 plants of each species per acre." It should be noted that the appropriate shrub stocking rate will be dependent on shrub densities in the Reference Area which should be determined during the 1982 season.

B. 784.13

(b)(1) The reclamation plan for this area is not considered complete. However, during the Division's permit review for the Wilberg Mine, a comprehensive reclamation plan for this area will be required as part of the completed permit.

(b)(5)(i) Timing of revegetation is approved. However, repeat seedings, which are expected to be required, should occur at a time which maximizes available moisture (early spring or late fall).

(b)(5)(ii) The revegetation species as proposed are approved with the request that Cercocarpus ledifolius be replaced by Cercocarpus montanus, which currently occurs in the immediate area of the proposed waste rock disposal site, and that Amelanchier alnifolia be replaced by Amelanchier utahensis, which is more drought tolerant. It should be noted that due to the high electrical conductivity measurements obtained from the soil samples in the area, the applicant may want to substitute more salt tolerant species, such as Atriplex confertifolia during final reclamation if the condition persists.

(b)(5)(iii) Grass seeding rates (five lbs/ac/species, PLS) should be dependent upon the method of application. The applicant needs to address the method to be used in planting and seeding, i.e., seed will be hand-broadcast, drilled, etc. In addition, as primary postmining land-use is expected to be wildlife habitat, plant groupings should be distributed to maximize benefit to wildlife, i.e., grouped or clumped in a manner which optimizes edge effect, cover, etc., as per 817.97(d)(9)(C)(ii).

(b)(5)(iv) The applicant needs to address the rate of mulch application and method of anchoring. It is anticipated that anchoring of the proposed straw mulch will be necessary in order to realize any benefit from mulching. The Division suggests that immediately following seeding of grass species, the

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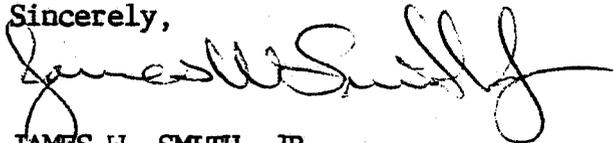
straw mulch be applied at a rate of approximately 1.5-2.0 tons per acre and crimped into the soil. After the mulch is anchored, containerized forbs and shrubs can then be planted.

(b) (5) (v) The applicant needs to address whether or not irrigation will be utilized and, if so, under what conditions and to what extent.

(b) (5) (vi) The applicant needs to address the measures which will be used to determine revegetation success as per UMC 817.116, i.e., how will revegetation be monitored? For example, how often will monitoring be conducted, yearly, every other year, etc.? When will monitoring be conducted, e.g., at the height of the growing season? How will vegetative parameters such as cover, production, diversity, species survivability, density, etc., be measured?

In summary, the Division finds that Stipulation 9-25-1 and 9-25-2 have been satisfactorily addressed and that Stipulation 9-25-3, relative to the reclamation plan, is still deficient as outlined above. The deficiencies noted in the reclamation plan, however, are not such that approval of the waste rock disposal sites for the above-referenced mines should be further delayed. These remaining concerns will be addressed during review of the permanent program submittal. Therefore, the Division hereby acknowledges the satisfactory completion of the stipulations by Utah Power & Light Company regarding the Division's September 28, 1981, approval of the waste rock disposal sites for the Des-Bee-Dove and Wilberg mines. If you have further questions regarding this matter, please contact Sally Kefer of my staff.

Sincerely,



JAMES W. SMITH, JR.
COORDINATOR OF MINED
LAND DEVELOPMENT

cc: Richard Dawes, OSM
Joe Helfrich, DOGM

JWS/SK:btb