



1407 West North Temple
P.O. Box 899
Salt Lake City, Utah 84110

RECEIVED

MAR 18 1985

DIVISION OF OIL
GAS & MINING

FILE #2
COPY TO:
T. MUNSON

March 15, 1985

Mr. Mark Humphrey
U. S. Department of the Interior
Office of Surface Mining
Reclamation and Enforcement
Brooks Towers
1020 15th Street
Denver, Colorado 80202

Re: Des-Bee-Dove Mine Permit Application

Dear Mr. Humphrey:

Enclosed are six sets of revisions and additions in response to the remaining deficiencies we received on February 22, 1985. Seven additional sets are sent to Ron Daniels at DOGM and one set to George Cotton of Simons Li & Associates.

1. Deficiency - UP&L has committed to sampling fill material along the Des-Bee-Dove/Wilberg Junction Road for use as a topsoil substitute material for final reclamation. However, UP&L should also provide additional details specific to sampling and analytical techniques. At a minimum, the description of the sampling techniques should include sample locations (map), number of samples, sampling intervals of the material (every two feet is recommended) and projected volume of material. The analyses should include data on soil texture, pH, electrical conductivity (EC), and sodium absorption ratios (SAR).

UP&L must also provide a commitment to identify the location of the best available topsoil substitute materials, document estimates of available topsoil substitute material volumes and projected depths of replacement on the reclamation surface, and commit to utilize all available suitable topsoil substitute material.

Response - Company has added language committing itself to soil sampling of the Des-Bee-Dove/Wilberg junction road (see page 2-126).

2. Deficiency - UP&L must provide a commitment to develop and implement a mitigation plan, in consultation with the U. S. Fish and Wildlife Service and the regulatory authority, should potential subsidence-related impacts to raptor nests constructed on escarpments be anticipated during the life-of-mine.

Mr. Mark Humphrey
March 15, 1985
Page 2

Response - See page 4-35.

3. Deficiency - UP&L must revise the desert shrub seed mix such that a minimum of 40 seeds per square foot of pure live seed is used during final reclamation.

Response - Accordingly, calculation using Native Plants, Inc. (SLC) seed catalog show results indicating more than double the minimum seed requirement per square foot of P.L.S. desert shrub seed mix of which will be used during final reclamation:

<u>Species</u>	<u>Seeds/lb</u>	<u>PLS*</u> <u>lb/Acre</u>	<u>Total</u> <u>Seeds/Acre</u>
<u>Grasses</u>			
Salina Wildrye	379,500	1	379,500
Indian Ricegrass	141,000	4	564,000
Squirreltail	192,000	1	192,000
Great Basin Wildrye	130,000	3	390,000
<u>Forbs</u>			
Corymbed Eriogonum	209,000	2	418,000
Eaton Penstemon	600,000	2	1,200,000
Yellow Sweetclover	260,000	2	520,000
<u>Shrubs</u>			
Cuneate Saltbush	30,300	15	454,500
Total		30	4,118,000

*Pure Live Seed

$$\frac{43,560 \text{ Sq. Ft.} = 94,54 \text{ Seeds/Sq.Ft.}}{4,118,000 \text{ Seeds/Acre}}$$

4. Deficiency - UP&L must demonstrate that the long-term stability of the cut structure at station 125+00, along the Des-Bee-Dove/Wilberg Junction Road, meets the 1.5 static safety factor requirement under UMC 817.101(b) (1).

Response - Company has seen fit to combine other geotechnical studies with the cut slope associated with the bypass road. As stability is a function of core sampling which requires surface access, additional permission will be needed from the State and the Bureau of Land Management. We anticipate approvals within two weeks time. Therefore, owner submits to stipulation that proof of stability is a requirement of permit.

Mr. Mark Humphrey
March 15, 1985
Page 3

Note: It has come to our attention that previously submitted mine plans were void of plans to access federal coal in Lease U-02664. In keeping with past submittals we are including an updated five-year mine plan and a life of mine plan. These maps will replace maps in map packet 3-1, 3-2, 3-3 and 3-4.

If you require further information please contact this office.

Sincerely,



C. E. Shingleton
Director of Permitting,
Compliance & Services

CES:SMC:bb:4760
Enclosures

cc: Ron Daniels, DOGM
George Cotton, Simons & Li
Larry Guymon, EMC