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

file ACT/015/017 #2

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JUL 13 1988

**DIVISION OF
OIL, GAS & MINING**

July 11, 1988

Mr. John Whitehead, Permit Supervisor
Division of Oil, Gas and Mining
State of Utah
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

Re: Mid-Term Review, Utah Power & Light Company,
Des-Bee-Dove Mine, ACT/015/017, Folder #2,
Emery County, Utah

Dear Mr. Whitehead:

The following comments address issues and concerns raised
by the Division in regards to the Des-Bee-Dove Mine permit mid-term
review.

Sincerely,

A handwritten signature in cursive script that reads "David Smaldone".

David Smaldone
Director of Permitting,
Compliance & Services
Mining Division

DS:bb:6006
Enclosure

UMC 782.13 (b) IDENTIFICATION OF INTERESTS (PGL)

Pages 1-1 through 1-5 have been revised using the revision date of 6/29/88.

UMC 784.13 RECLAMATION PLAN: GENERAL REQUIREMENTS (DD/PGL)

Pages 4-7.1, 4-7.2, 4-7.3, 4.8, 4-13 through 4-17, 4-21 and 4-22 have been added or revised using revision dates of 7/11/88. Also, the following letters found after page 4-12 should be deleted from the permit application: September 5, 1984 letter from Larry Guymon to Lynn Kunzler, September 14, 1984 letter from Wayne Hedberg to Larry Guymon and September 17, 1984 letter from James Smith to Allen Klein. Maps 2-15 Drawing No. CM-10336-DS revised 7/11/88 and 5-6 Drawing No. CM-10613-DS revised 7/11/88 should replace existing maps.

UMC 784.14 RECLAMATION PLAN: PROTECTION OF HYDROLOGIC

BALANCE (TM)

In the permit for the Des-Bee-Dove Mine the hydrology of East Mountain is discussed and the monitoring of the hydrology that is being completed relative to the adjacent Deer Creek and Wilberg/Cottonwood permit areas. It is felt that these items should be discussed in the Des-Bee-Dove permit because the hydrology is best understood by studying it from a regional basis rather than on a local basis.

The mine workings of the Des-Bee-Dove mines have been dry with the exception of localized short-lived occurrences of ground water. When ground water was intersected in the mine, it was monitored to better understand its occurrence. At the time of the closure of the mines in February 1986 no water was actively flowing into the mine workings. If and when the mine is once again activated UP&L shall inspect the accessible working for water occurrences and shall monitor any occurrences that are found.

One spring has been identified on the land surface within the permit area. This spring, 82-51 is monitored once in July each year and once in October and will continue to be monitored throughout the permit term. This includes the sampling for the following quality parameters:

Field Measurements:

Flow
pH
Specific Conductivity (umhos/cm)
Temperature

Laboratory Measurements:

Total Dissolved Solids	Magnesium
Total Hardness (as CaCO ₃)	Manganese
Aluminum	Mercury
Arsenic	Molybdenum
Barium	Nickel
Boron	Nitrogen: Ammonia
Carbonate	Nitrite
Bicarbonate	Nitrate
Cadmium	Potassium
Calcium	Phosphate
Chloride	Selenium
Chromium	Sodium
Copper	Sulfate
Fluoride	Sulfide
Iron	Zinc
Lead	

The annual report for 1987 relative to the hydrologic monitoring program for East Mountain updates records for the Des-Bee-Dove Mine area.

UMC 784.20 SUBSIDENCE CONTROL PLAN (RVS)

Utah Power & Light shall monitor the mining induced subsidence in areas where mining may have caused the surface of the land to subside within the permit area. This monitoring shall be done using photogrammetric methods as has been the practice since 1980. The results of the monitoring shall be summarized in a report and submitted to the Division annually. Areas of suspected subsidence shall be monitored annually until UP&L can sufficiently document and prove to the Division that the subsidence has stabilized. In such a case, UP&L shall submit a formal request to the Division recommending that subsidence be terminated. This request shall be accompanied by technical data which shows that the subsidence has stabilized. UP&L shall cease monitoring an area only after the Division has notified UP&L of their concurrence with our request.

UMC 817.44 HYDROLOGIC BALANCE: STREAM CHANNEL DIVERSION

(TM)

Above the upper channel transition section the fills, including the stockpile coal areas, will be removed for the canyon invert and the original channel will be established in parent material, i.e., bed rock ledges.

On the tipple level pad, an upper channel transition section will be built where the reestablished channel terminates on the tipple pad area. From section 0+00 to station 7+00 the reclaimed channel will be located along the northeast side of the canyon wall, so to take advantage of the rock outcrop for channel construction. A grouted riprap ford will be built between stations 7+00 and 8+00. A cascading rock fan will be built from station 8+00 to station 10+00 and from station 10+00 to 11+60 an energy dissipation fan will be built. This fan will discharge the run-off onto the existing ledge outcrop and into the original channel.

Refer to the drawing and sections for details of the channel construction and sizing.

The channel from section 8+00 to 11+00 is located on fill material and therefore will be treated as an experimental practice according to UMC 785.13.

Map 4-1 Drawing No. CM-10393-05 sheet 2 of 5 revised 7-11-88 should replace the existing map.

UMC 817.100 CONTEMPORANEOUS RECLAMATION (JW)

At this point in time it is difficult to provide the Division with a definite time frame for final reclamation of the Des-Bee-Dove facilities. This is due to three primary reasons, 1) uncertainty of utility demand, 2) economical feasibility of room-and-pillar mining at Des-Bee-Dove, 3) sterilization of approximately 6 million recoverable tons of coal. Over 3 million tons of this coal are federally owned.

Utah Power and Light's long-term plans for Des-Bee-Dove are to mine if demand increases. UP&L has idled the property to reduce costs and balance demand. This property is also maintained for emergency coal supply. Coal was mined extensively during the Wilberg fire and recovery to make up for lost production. Should another emergency or loss of production occur at the other UP&L mines, Des-Bee-Dove could be ready for production in a few weeks.

The Des-Bee-Dove Mine reclamation can be addressed again when the new permit term begins. As a means to address interim reclamation the following measures will be taken. Present activities (portal inspections, surface drainage maintenance, etc.) require continued use of the primary roads and pad areas. Therefore, establishment of temporary vegetation at these areas is not compatible with said activities. However, temporary vegetation, in addition to "Interim Vegetation" discussed elsewhere in the PAP, will be established on primary road berms, secondary roads and inactive pad areas. Species and methodologies will be as described in the Interim Revegetation section of the PAP.

UMC 817.116 REVEGETATION: STANDARDS FOR SUCCESS (BAS)

(c) (2) - See page 4-12.1 and the 1987 Vegetation Annual Report.