



STATE OF UTAH
NATURAL RESOURCES
Oil, Gas & Mining

Norman H. Bangerter, Governor
Dee C. Hansen, Executive Director
Dianne R. Nielson, Ph.D., Division Director

355 W. North Temple • 3 Triad Center • Suite 350 • Salt Lake City, UT 84180-1203 • 801-538-5340

April 20, 1988

Mr. David Smaldone
Utah Power and Light Company
Mining Division
P. O. Box 899
Salt Lake City, Utah 84110

Dear Mr. Smaldone:

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

Attached are the Division (DOGM) comments for the Mid-Term Review of the Des-Bee-Dove permit. The comments are compiled as a result of Division review of the Des-Bee-Dove Permit Application Package, and from the site visit by Division staff on April 7, 1988.

After reviewing the comments, would you please assemble a complete response addressing each comment. This response must be received from Utah Power and Light Company by May 27, 1988.

Please feel free to contact me if you have any questions on this matter.

Sincerely,

A handwritten signature in cursive script that reads "Lowell P. Bampton" with "for" written below it.

John J. Whitehead
Permit Supervisor/
Reclamation Hydrologist

djh
Attachment(s)
0800R/73

MID-TERM REVIEW

UTAH POWER AND LIGHT COMPANY
DES-BEE-DOVE MINE
ACT/015/017

April 22, 1988

MID-TERM REVIEW

UMC 782.13(b) Identification of Interests-(PGL)

The operator should update the current legal information. The references to Emery Mining Company, for example, are obsolete and must be updated.

UMC 784.13 Reclamation Plan: General Requirements-(DD/PGL)

On page 2-126 of the MRP, the applicant committed to a sampling program in 1985 of the fills on the Des-Bee-Dove/Wilberg Junction road to determine the suitability of this material as a substitute topsoil. Also, on page 4-11 the applicant committed to sample fill areas on the mine facilities area to provide a detailed analysis of soil productivity. This analysis was to be used during final reclamation for soil fertility and handling purposes.

Furthermore, the applicant has committed on page 2-126-A of the MRP to provide, after mining and before reclamation, a soil comparison map to exhibit volumes and locations of suitable substitute topsoil material to be used during backfilling and grading. The applicant also commits, on page 4-6, to bury all acid or toxic-forming materials with four feet of suitable backfill material. But the applicant did not provide a sampling program to determine the presence or absence of acid or toxic-forming materials.

To meet the requirements of UMC 784.13 Reclamation Plan: General Requirements, parts (3), (4), (5)(vii) and (7), and to fulfill the applicant's commitments in the MRP, the applicant must conduct a comprehensive soil sampling program. The sampling program shall be conducted on the Des-Bee-Dove/Wilberg Junction road and on the mine facilities area. The program shall be conducted to identify all suitable backfill materials which can be used as substitute topsoil, and to identify all acid or toxic-forming materials.

Representative samples shall be taken from each fill to be used as a backfill and samples shall be taken to depth at each sample point. At a minimum, each sample shall be analyzed for: pH, Ec, SAR, texture, percent saturation, percent organic carbon, total N, available P, Boron, Selenium, and all coally material shall be analyzed for Acid-Base Potential.

From this sampling program a map shall be derived which exhibits all sample locations including volumes and locations of all suitable material to be used as substitute topsoil.

Before the applicant initiates this comprehensive sampling program, the applicant should consult with the Division to ensure the most cost effective program.

The reclamation of the Wilberg/Des-Bee-Dove Junction road should be more clearly detailed in the reclamation plan. The reclamation of the access road should also be detailed; i.e., the removal of asphalt and ripping of the road should be described.

The area near the conveyor and upper storage pile should address the removal of all of the coal which seems to be compacted as road base and/or used for construction of the pad.

UMC 784.14 Reclamation Plan: Protection of Hydrologic Balance-(TM)

(b)(3) The water monitoring plan is not current, clear, and concise. This is mainly due to the amount of additional information included in the PAP that really does not need to be included in the PAP. Utah Power and Light Company must update and improve the water monitoring plan section of the Des-Bee-Dove PAP. All extraneous water monitoring information concerning other Utah Power and Light Company mines need not be included in the PAP.

UMC 817.44 Hydrologic Balance: Stream Channel Diversion-(TM)

(d) The reclamation plan as it currently stands is in many senses an unrealistic plan from a hydrologic standpoint. The plan currently proposes to drop the reclaimed drainage off the access road onto a rock fan with slopes in excess of 50 percent. The operator should attempt to move the drainage over to the edge of the pad and the road so that they can feasibly engineer a channel. Not only will the maintenance of such a channel be reduced, but the slopes would be reduced to a more acceptable gradient to potentially place riprap on. With the incorporation of several drop structures, clay liners and energy dissipation basins, it may be possible to engineer a more stable channel. The feasibility of engineering a channel as it is currently proposed is not possible and may end up in uncontrolled drainage flowing down the outslope of the pad. The permittee will have to request a designation of Des-Bee-Dove's final postmining diversion channel as an experimental practice, meeting the requirements of UMC 785.13 in order to make these changes.

UMC 817.100 Contemporaneous Reclamation-(JW)

Utah Power and Light Company (UP&L) notified the Division over a year ago that the Des-Bee-Dove would be in an indefinite period of suspension. In addition, during recent discussions regarding the Wilberg/Cottonwood Mine, UP&L representatives have emphasized that room and pillar mining methods are not economically feasible for UP&L.

Prompt reclamation of areas disturbed by mining is required by state and federal statute. Thus UP&L must provide a time frame for when final reclamation will occur.

Additionally, because the site is inactive, temporary vegetation stabilization of roads and pads must be undertaken. Please submit details for a temporary vegetative stabilization plan.

UMC 817.116 Revegetation: Standards for Success-(BAS)

(c)(2) The following interim revegetation commitments have been neglected: (1) shrub test plantings (page 4-14, 4-15); (2) annual quantitative revegetation monitoring (page 4-16); and (3) annual reporting of revegetation work (page 4-16). These commitments must be carried out.

Utah Power and Light must provide the Division with a report of interim revegetation work done to date. This report should include data on ground cover, species composition, and frequency. The report should discuss what has been learned about plant species and planting techniques which will benefit final reclamation efforts.

Future reports must be submitted annually as stated in the PAP.

0800R/73-77

Corrected copy

hand delivered to

Dave Sordone on 5/17/88

(Um c 754.20 was missing
from the previous copy)

MID-TERM REVIEW

UTAH POWER AND LIGHT COMPANY
DES-BEE-DOVE MINE
ACT/015/017

April 22, 1988

MID-TERM REVIEW

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UMC 784.20 Subsidence Control Plan-(RVS)

The approved permit encompasses commitments by the operator to annually conduct conventional subsidence monitoring (Appendix XIII, page 3) above the Fifth West (Deseret Mine) and Fourth West (Beehive Mine) panels and photogrammetric subsidence monitoring over the remaining area of mine development to detect ground movement. Visual inspections are to be conducted bi-annually (Appendix XIII, page 4) to identify surface manifestations of subsidence. Subsidence monitoring data are to be submitted annually in a report (Appendix XIII, page 4).

Review of the Annual Subsidence Monitoring Report for 1986 (page 12), received July 22, 1987, indicates the operator intends to adjust the monitoring schedule to acquire ground movement data once every two years above the Second North panel. See letter dated September 9, 1987 from John J. Whitehead to Raymond Christensen. To avoid enforcement action, the Division recommends the operator submit a request to amend the schedule in the approved Subsidence Monitoring Plan. The amendment request should demonstrate surface stability above the Second North Panel. The Division suggests the operator graphically represent vertical movement versus time to potentially derive an asymptotic curve that demonstrates ground stability. The Division notes that a similar amendment request will be required if the operator anticipates eliminating conventional subsidence monitoring above the Fifth West panel.

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April 20, 1988

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djh
1482R 4/25/88