

**PACIFIC POWER • UTAH POWER**

324 South State  
P.O. Box 26128  
Salt Lake City, Utah 84126-0128



September 7, 1990

Ms. Pamela Grubaugh-Littig  
Permit Supervisor  
Division of Oil, Gas and Mining  
355 West North Temple  
3 Triad Center, Suite 350  
Salt Lake City, UT 84180-1203

Re: **PARTIAL RESPONSE TO INITIAL COMPLETENESS REVIEW,  
~~FIVE-YEAR PERMIT RENEWAL, DES-BEE-DOVE MINE,~~  
ACT/015/017, FOLDER #2, EMERY COUNTY, UTAH**

Dear Ms. Littig:

Transmitted herewith is a partial response to your Initial Completeness Review letter dated June 25, 1990.

Included herein are 12 copies each of Volume 1 secured in new binders. This new version of Volume 1 contains completely updated Sections 1 (Legal) and 2 (Environment). Sections 1 and 2 have each been retyped with new page numbers and referenced to the rewritten rules as requested. Attached is a copy of your comments with the new page numbers noted to the right for easy location of our response. The majority of our responses will be with our second submittal.

The text material within Section 1 has also been updated to reflect the most current status of the applicant, PacifiCorp. This new Volume 1 should now replace the original Volume 1 of the PAP.

It is our intent to furnish you new volumes of Volume 2 inclusive of updated Sections 3 (Operations) and 4 (Reclamation) completely retyped, numbered and referred to the rewritten rules on or before September 28, 1990. At this time we will also provide an updated Table of Contents for all volumes in the PAP.

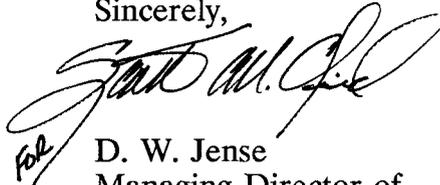
Also accompanying this submittal are two (2) copies of Volume 7 and the maps you requested in your letter of June 25, 1990.

We apologize for our delay in responding to this matter and we kindly appreciate your help and understanding.

Ms. Pamela Grubaugh-Littig  
September 7, 1990  
Page 2

Should you have any questions concerning this submittal please feel free to contact Scott Child of this office at 220-4612 or Val Payne at our Huntington office at 687-9821.

Sincerely,

A handwritten signature in black ink, appearing to read "D. W. Jense". The signature is fluid and cursive, with a large initial "D" and "J".

D. W. Jense  
Managing Director of  
Administration  
Fuel Resources

DWJ:SMC:bb:6525  
Enclosure

cc: Scott Child  
Val Payne

Utah Power and Light Company  
Emery County, Utah  
June 25, 1990

Partial Response  
Submitted 9-7-90  
Volume 1

R-614-301-200 Soils-(HS)

The applicant must commit to fulfilling the requirements of this section for all new, previously undisturbed disturbances (i.e., soil removal, storage, redistribution, etc.).

220. Environmental Description-(HS)

222.100 Soil Survey Map 2-16 must be revised to include the entire Des-Bee-Dove Haul Road. Additionally, soil identifications and soil boundaries must be depicted on Map 2-16 and correlate with the soil descriptions located on pages 2-130 and 2-131.

NI

230. Operation Plan

231.100 General Requirements The applicant must describe the methods for characterizing, removing, storing and protection of the topsoil, subsoil, and other material removed during the construction of the sedimentation pond. Additionally, the applicant must provide volume estimates of the soil stockpile and depict the stockpile on an appropriate map or plate.

NI

233. Topsoil Substitutes and Supplements On page 3-47 the operator refers to "test borings" of the tippie pad material for the purpose of ascertaining the extent of coal waste and boney material. Please provide the data generated by these test borings.

NI

On page 4-7.3 the applicant refers to estimating the volume and location of suitable substitute topsoil. Please submit this information for inclusion in the PAP.

NI

240. Reclamation Plan

243. Soil and Nutrients and Amendments Sampling procedures to determine the soil nutrient deficiencies within the regraded soil must be specified. The applicant must describe the constituents to be analyzed, laboratory and field sampling methodologies employed.

NI

R614-301-300 Biology-(SMW)

320. Environmental Description

321.100 Vegetation Information Please include in the Permit Application Package (PAP) a description of the salt desert shrub and Pinyon-Juniper vegetative type which is within the boundaries of the permit area. The general description of the salt desert shrub type is not representative of the permit area. The description of the Pinyon-Juniper type and associated species does not include the haul road.

NI

322.220 Fish and Wildlife Information The PAP must include site specific wildlife and associated habitat information to include the entire permit area (haul road).

NI

323.400 Maps and Aerial Photographs The applicant must submit a vegetation map which includes the entire permit area (haul road, Map 2-12).

NI

330. Operation Plan

332. Operation Plan Please include a statement in the PAP of the anticipated impacts of subsidence on renewable resources.

NI

333. The applicant must include in the PAP a description of the environmental protective measures used during coal mining and how the operation will minimize impacts to the environment throughout the life of the mine. How is this currently being done?; are these protective measures being monitored?; do these measures include the haul road?.

NI

340. Reclamation Plan

341.210 Revegetation The application does not include a seed mixture for the Pinyon-Juniper vegetative type along the haul road. Please include this in the PAP.

NI

342.100 Fish and Wildlife The application will include a description of the wildlife enhancement measures to be used during reclamation and postmining.

NI

350. Performance Standards

356.100 Revegetation: Standards of Success Table 10 (page 2-117) is not complete or adequate (no area measurement is listed) to evaluate the revegetation success of the reclaimed area. The tree and shrub standard of the Pinyon-Juniper reference area is not representative of the Pinyon-Juniper type along the haul road. The applicant must quantitatively measure the tree and shrub densities in the Pinyon-Juniper type adjacent to the haul road in order to evaluate the appropriate tree and shrub stocking rate for the postmining land use.

NI

**357.220 Revegetation: Extended Responsibility Period** The applicant should realize and state in the PAP that the extended period of responsibility will continue for not less than 10 years. The Salt Desert Shrub vegetation type is a very difficult site to stabilize and establish. It may well take more than 10 years to meet the vegetative success standard for bond release.

NI

**358.500 Protection of Fish, Wildlife and Related Environmental Values** The plan will specifically address the protection of wildlife from fences, conveyors, other barriers, toxic-forming materials and other hazards.

NI

**R614-301-400 Land Use-(SMW)**

**410. Land Use**

**411.140 Cultural and Historic Resources Information** The application will contain maps which show the cultural and historic resources listed or eligible for listing in the National Register and known archeological sites (including the haul road) within the permit and adjacent areas.

Pg. 2-71, 2-100, 2-104  
 2-108, 2-112, 2-116,  
 2-119, 2-124, 2-129,  
 2-130

**411.142** The cultural and historic resources information in the PAP must include coordination with the State Historical Preservation Officer. A letter included in the PAP will suffice as coordination.

Pg. 2-132

**412.100 Reclamation Plan** The applicant must clearly state the proposed postmining land use. The statement will include how the postmining land use will be achieved.

NI

**412.200** The applicant will include a copy of comments from the legal or equitable surface owner concerning the proposed land use.

NI

**R-614-301-500 Engineering-(JK)**

**510. Introduction**

**515.100 Reporting and Emergency Procedures** The operator must incorporate in the permit application a description of the procedure for reporting a slide and a commitment to comply with any remedial measures required by the Division.

NI

**515.200** The operator must incorporate a description of the procedure for reporting an impoundment hazard, emergency procedures to be followed in the event of such a hazard, and remedial actions to be taken.

NI

**515.300** The operator must provide a description of procedures to be followed in the event of temporary cessation of operations.

NI

**520. Operation Plan**

**521. General** All general maps depicting the Cottonwood/Wilberg and Des-Bee Dove Mine permit areas must depict the new Cottonwood/Wilberg Waste Rock Storage Facilities.

NI

Additionally, the applicant must include a description of the disposal methods for placing underground development waste and excess spoil in the new Cottonwood/Wilberg Rock Storage Facility.

**521.200** The operator must commit to providing the signs and markers described in this section.

NI

**525.300 Subsidence** The operator must commit to give public notice of the resumption of mining operations at least 6 months prior to mining.

NI

**527.100 Transportation Facilities** The operator must classify each road as either a primary or ancillary road, as defined in this section.

NI

**528. Handling and Disposal of Coal, Overburden, Excess Spoil and Coal Mine Waste** The operator must update the permit application to refer to the new Cottonwood/Wilberg Waste Rock Storage Facility.

NI

**530. Operational Design Criteria and Plans**

**533. Impoundments** The operator must provide engineering data and calculations to show that the sedimentation pond has a static safety factor of at least 1.5 for the normal pool with steady-state seepage and a seismic safety factor of at least 1.2.

NI

**534.130 Roads** The operator must provide engineering data and calculations to show that the road embankments have a static safety factor of at least 1.3.

NI

**534.300** The operator needs to classify all roads as either primary or ancillary, in accordance with R614-301-527.100.

NI

**537. Regraded Slopes** The operator must supply information regarding the backfilling and grading of the parking lot/bathhouse/warehouse area and the Desert Portal area. Specifically, the operator must indicate where the necessary fill material for these sites will be obtained and provide volume estimates to show that the volume of available fill material will indeed be sufficient to meet the requirements.

NI

**540. Reclamation Plan**

**541.300 General** The operator must provide the Division with a copy of a letter from the U.S. Forest Service which authorizes retention of the road for postmining uses (see R614-301-412.200).

NI

8-20-90

Pam,

I talked to Carter Reed about this. He said that the BLM is now making an assessment of the potential for escarpment failure above Des-Bee-Dove. He is awaiting the results of that assessment. He will make those results known to us as soon as he gets them.

Gene

**542.800** The operator must update the estimate of reclamation costs to make certain it accounts for the reclamation of mine appurtenances that have been constructed since the last permit renewal. For example, the present reclamation cost estimate does not include the cost of removing either the large culvert below the Deseret Portal area or the culvert beneath the Cottonwood/Wilberg Junction Road.

NI

#### 550. Reclamation Design Criteria and Plans

**553.100 Backfilling and Grading** The operator must supply information regarding the backfilling and grading of the parking lot/bathhouse/warehouse area and the Deseret Portal area. Specifically, the operator must indicate where the necessary fill material for these sites will be obtained and provide volume estimates to show that the volume of available fill material will indeed be sufficient to meet the requirements.

NI

**560. Performance Standards** The operator must include a statement to the effect that coal mining and reclamation operations will be conducted in accordance with the approved permit and the requirements of R614-301-510 through R614-301-553.

Pg. 3 of  
Introduction

#### R614-301-700 Hydrology-(JE)

##### 720. Environmental Description

**722.500 Cross Sections and Maps** Map 4-1 (2 of 5) does not include the entire watershed for Ditch "A". An additional map of the same scale must be included to allow for accurate determination of the Ditch "A" watershed.

NI

**727. Alternative Water Source Information** Page 4-33.3 discusses replacement or compensation of surface water rights diminished as a result of subsidence. The PAP must quantify the water rights associated with springs within and adjacent to the permit boundaries. The operator must identify any existing water rights for replacement of spring water and discuss alternate water sources.

NI

##### 730. Operation Plan

**731.222** Pages 4-25 and 4-26 refer to two springs and the monitoring of those springs. These springs must be identified and the appropriate map referenced. The monitoring parameters, sampling frequency, and test results must be referenced in the PAP.

NI

**731.222.2 Water Monitoring** Page 4-25 states water discharged from sedimentation ponds will be monitored to insure the effluent limitations are not exceeded. The mine UPDES permit must be referenced and included in the PAP.

NI

##### 740. Design Criteria and Plans

**741. General Requirements** Map 3-8 shows a loop road with two sediment basins and another sediment basin located at the hairpin of the mine road. These areas have not been addressed in either the operation or reclamation plan. Design criteria and plans must be included in the PAP for these drainage areas.

NI

**742.110 Sediment Control Measures** The reclamation sediment control plan on pages 4-5 and 4-5.1 discusses channel designs for the haul road and contour ditches for the sediment pond area. The plan does not address the necessary sediment control measures to minimize erosion and retain sediment within the disturbed area for the entire haul road, access road, and portion of the sedimentation pond area. The PAP must include all sediment control measures and siltation measures with design criteria, cross sections and maps.

NI

**742.120 Sediment Control Measures** The reclamation plan does not address the removal and reclamation of the 84-inch culvert running off the lower pad. The reclamation design criteria and plans must be included in the PAP.

NI

**742.213 Siltation Structures** The current operation includes the use of silt fences on a small area located east of the sedimentation pond which drains below this pond. The design criteria and plans must be included in the PAP and documented on the appropriate maps.

NI

**742.312 Diversions** The unnumbered page immediately following page 4-7-C consists of a photo copy of hydrologic and riprap design calculations. The first and last column did not copy. This page must be resubmitted.

NI

Page 4-7-A refers to flow velocity vector analysis for water level changes at the bend of the main channel diversion. The vector analysis must be included in the PAP.

NI

Page 4-7-C refers to backwater analysis for transition flow at the upper end of the main diversion channel. The backwater analysis must be included in the PAP.

NI

**742.314** Page 4-4.11 states soil samples will be taken to determine final selection of filter material. To ensure adequate time to complete the design and the Division review, the operator must commit to a time frame for soil sampling and submittal of results and design for the Division review and inclusion into the PAP.

NI