

PACIFIC POWER • UTAH POWER

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

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PACIFICORP
ELECTRIC OPERATIONS GROUP

DIVISION OF
OIL GAS & MINING

May 28, 1991

HAND DELIVERED

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

**RE: TECHNICAL DEFICIENCIES RESPONSE, PERMIT RENEWAL, PACIFICORP
ELECTRIC OPERATIONS, DES BEE DOVE MINE, ACT/015/017, EMERY
COUNTY, UTAH**

Dear Ms. Littig:

Transmitted herewith please find information addressing the Technical Deficiencies regarding the above referenced permit as identified by Ms. Susan White (see attachment). For clarity, the Rule addressed by each deficiency is written with PacifiCorp's response following.

R614-301-113

Please see page 1-13, Revised 5/28/91.

R614-301-114.200

Please see pages 1-29.1 and 1-29.2, Added 5/28/91.

R614-301-117.200

Please see page 1-43, Added 5/28/91.

R614-301-341.100

Please see page 4-75.1, Added 5/28/91

R614-301-353.110

Please see page 4-82, Revised 5/28/91 and page 4-82.1, Added 5/28/91.

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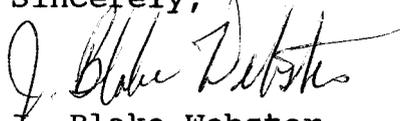
R614-301-356.231

Please see pages 2-168 and 4-83, Revised 5/28/91.
Additionally, page 2-167 also required revising as a result
of this action.

This material replaces or supplements the PAP information
previously submitted. Upon approval, the necessary additional
copies will be submitted to the Division.

If you have questions regarding this submittal please call Guy
Davis or Val Payne at 653-2312 or myself at 220-4584.

Sincerely,



J. Blake Webster
Permitting Administrator

VP/do
Attachment

**TECHNICAL DEFICIENCIES
DES-BEE-DOVE MINE
ACT/015/017**

R614-301-100 GENERAL CONTENTS (SW)

R614-301-113 The operator must make a statement as to permits that have been revoked or bonds forfeited in the permit.

R614-301-114.200 Where the private mineral estate has been severed from the private surface estate, please submit either the requirements of R614-301-114.210, .220, or .230 for inclusion in the plan.

R614-301-117.200 Please include a copy of the newspaper advertisement or proof of publication of the renewal for inclusion in the permit.

R614-301-300 BIOLOGY (SW)

R614-301-341.100 Please include a detailed schedule and time table for each step in the revegetation plan. A schedule such as found in the Division's Revegetation Guidelines is acceptable (see attached).

R614-301-353.110 This regulation states that the reclaimed vegetation will be diverse. This is a requirement of the regulations. The statute, UCA 40-10-18 (f), states that the operator will establish on regraded areas a diverse vegetative cover. A diverse seed mixture does not mean that a diverse vegetative cover will be established, especially when aggressive introduced species are used in the seed mixture and found in the soil seed bank.

One method to determine whether or not a diverse vegetative community has been achieved, is based on species composition, life form, and seasonality of the vegetation. All species within each vegetative community are ranked by relative cover, productivity or frequency. The ranking determines the relative importance of each species. The number of species contributing greater than five percent of the relative importance in the reference area data designates the number of species, the life forms, and seasonality of the species to be established in the reclaimed area. No one species would make up greater than 50% of the importance value.

$$\text{Relative Cover (\%)} = \frac{\text{Cover (\%)} \text{ for Species}}{\text{Total Vegetation Cover (\%)}}$$

$$\text{Relative Cover} = \text{Relative Importance}$$

At the Des-Bee-Dove Mine referenced area, this would mean a minimum of three trees or shrubs, no Forbs, and three cool season grasses would need to be established in final revegetation.

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Technical Deficiencies
ACT/015/017

This method is currently being used by other states and will soon be reviewed by OSM for the Utah program.

R614-301-356.231 The permittee must provide a minimum shrub stocking density for the haul road Pinyon-Juniper vegetative community.

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Appendix A

Revegetation Schedule

TASK	MONTH:											
	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC		
Review revegetation plan	XX	X										
Order seed		X										
Order transplants			X									
Regrading						XXX	XXXX					
Spread topsoil								XXX				
Seedbed preparation								XX	X			
Apply fertilizer			XX*						XX			
Seeding									XX	X		
Mulching									XX	X		
Tasks to be done in subsequent years:												
Plant seedlings ¹		XX	X									
Monitor revegetation					XX	XXXX	XXX**		X***			
Submit monitoring report												X

Timeframes are approximate and will vary depending on site conditions and the acreage involved.

. 1 Plant transplants the spring following seeding if used.

- * May need application of N the spring following seeding.
- ** Monitor during peak of growing season as per monitoring schedule.
- *** For survival of transplants.