

0011



State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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

355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203
801-538-5340

July 17, 1991

Certified Return Receipt Requested
P 074 979 100

Mr. Robert Hagen, Director
Office of Surface Mining
Reclamation and Enforcement
Suite 310, Silver Square
625 Silver Avenue, S.W.
Albuquerque, New Mexico 87102

Dear Mr. Hagen:

Re: Ten-Day Notice X91-02-370-004 TV1, PacifiCorp Electric Operations, Des-Bee-Dove Mine, ACT/015/017, Folder #2, Emery County, Utah

This letter is in response to the above-referenced Ten-Day Notice, certified copy received July 8, 1991.

Number 1 of 1 Reads: "Failure to control or prevent erosion on road disturbance." Location: The section of the haul road through the Mancos Shale layer below the belt line runoff control. Regulation Citation: R614-301-752.210

Division Response: This TDN was issued for failure to control or prevent erosion on the permitted Des-Bee-Dove haul road. The OSM oversight inspection pointed out:

(1) That the belt line on the upper segment of the road routes surface runoff down the side of the road into a designed riprap channel and thence to a sediment pond. This control measure was observed in the field and has been successful in keeping road surface runoff off the steep raw Mancos shale road outslope. However, this measure has not been applied to a smaller, lower contiguous problem area; and

(2) That the studies, literature reviews and field meeting have been helpful in formulating and updating the final reclamation plan. Further, that erosion prevention and control for the interim period was not adequately addressed even though the field meeting and study plots have been implemented.

It should be pointed out at the outset that the erosion problem is confined to a small area and is isolated below the road and above the sediment pond. The outslope erosion area, as related to road distances, is less than ten percent of the total road area. The balance of the road is a testimony to high quality design proven by time. The Division does not intend to minimize the complex problem on the small area noted above. However, identifying problems and finding feasible solutions is collectively what we have been working on with OSM, the permittee, and others who have special expertise on this particular matter.

It was the consensus of the aforementioned group, at a previous field meeting, that proposed erosion corrective or prevention measures be validated through a field study trial. Thereafter, the proven successful practices would be implemented on the problem areas, and those that did not work would be noted and not applied. Long established conservation agencies, both federal and state that have worked on erosion, watershed, range, and vegetation management practices, fully recognize the complexity of erosion and vegetal regeneration on Mancos shale soils and subsoils. We have worked very closely with such organizations in order to benefit from these experiences.

We believe our collective actions on the erosion problem have been positive. In light of your concern, particularly as related to interim erosion protection, we are taking a two-fold action which we believe is a positive step to respond to the aforementioned TDN and result in on-the-ground corrective action. The two actions are as follows:

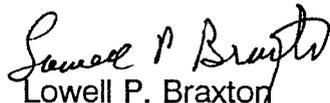
(1) The permittee has been requested to submit a plan with designs to prevent surface road runoff from discharging to the outslope on the lower segment of the haul road. A copy of the letter we have sent to the permittee is attached. The practices; i.e., belt line and approved diversion successfully utilized on the upper road mentioned in (1) above, will be implemented as an amendment on the lower segment.

(2) The studies, literature review, and field meetings, that have been helpful in formulating and updating the final reclamation plan, will be utilized in addition to other information in preparing the interim plan. In order to refocus on the interim erosion prevention and further corrective actions, our current thinking is as follows:

- (a) Reconvene the previous group with additional invitation for OSM participation and others with special expertise,
- (b) Group field meeting with written recommendations and time frames from the group,
- (c) Management review of recommendations and decisions on implementation, and
- (d) Notify permittee and obtain interim erosion plan and amendments as necessary.

The permittee has the lead role to develop a plan on items (1) and (2) above. This plan must be submitted to the Division by August 19, 1991. The Division, after reviewing the plan, will coordinate with the permittee on who will do what, as related to item (2).

Sincerely,


Lowell P. Braxton
Associate Director, Mining

jbe
Enclosure
cc: *A* Team
AT015017.1



State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203
801-538-5340

July 17, 1991

Mr. Blake Webster
PacifiCorp Electric Operations
Fuel Resources
One Utah Center
210 South Main, Suite 2100
Salt Lake City, Utah 84140-0021

Dear Mr. Webster:

Re: Request for Surface Haul Road Runoff Plans and Erosion Study for Haul Road, PacifiCorp Electric Operations, Des-Bee-Dove Mine, ACT/015/017, Folder #2, Emery County, Utah

There is erosion associated with the permitted Des-Bee-Dove haul road. The belt line on the upper segment of the road routes surface runoff down the side of the road into a designed riprap channel and then to a sedimentation pond. This control measure was observed in the field and has been successful in keeping road runoff off the steep raw Mancos Shale road outslope. However, this measure has not been applied to a smaller, lower contiguous problem area. A plan must be submitted to address this issue.

An ongoing joint study is being conducted by you, the Division, OSM, and others addressing the final reclamation possibilities for the haul road. The studies, literature review, and field meeting have been helpful in formulating and updating the final reclamation plan. This information, however, must be utilized, in addition to any other information, in preparing an interim plan for this area. In order to refocus on the interim erosion prevention and further corrective actions, it is incumbent upon PacifiCorp Electric Operations to take the lead toward resolution of this issue. Therefore, it is necessary to:

- 1) Reconvene the previous joint study group with additional invitation to other OSM personnel and any others with special expertise;

- 2) Conduct group field meetings with written recommendations and time frames for the group;
- 3) Allow time for Division and group review of recommendations and receive Division approval for implementation; and
- 4) Amend permit as necessary.

Please submit plans for both the interim erosion control plan and the field group study by August 19, 1991. If you have any question, please call me.

Sincerely,



Pamela Grubaugh-Littig
Permit Supervisor

jbe
cc: "A" Team
AT015017.4

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Utah Division of Oil, Gas and Mining
Department of Natural Resources
3 Triad Center, 355 West North Temple
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Salt Lake City, Utah 84180-1203

Telephone (801) 538-5340
FAX (801) 359-3940

DATE: 7-18-91

FAX #: 1-505-766-2609

FROM: Lowell Braxton

PLEASE DELIVER THE FOLLOWING PAGE(S) TO:

Robert Hagen, Director

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PS Form 3811, June 1988

DOGM JBE ACT/015/017 X91-02-370-004



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DOGM JBE ACT/015/017 X91-02-370-004 TV1

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OFFICE OF SURFACE MINING
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SUITE 310 SILVER SQUARE
625 SILVER AVENUE S W
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