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 DEPARTMENT OF NATURAL RESOURCES
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August 13, 1998

TO: File

THRU: Joe Helfrich, Permit Supervisor *JH*

FROM: Priscilla Burton, Reclamation Soils Specialist *PB*

RE: Review of Bond Release submittal: Vol 2, Part 4, Appendix VIII. Pacific Corp. Des Bee Dove Mine, ACT/015/017-DO97A. Folder #2. Emery County, Utah

SUMMARY:

Information concerning the Des Bee Dove haul road test plots was summarized and placed in Vol 2, Part 4, App VIII, entitled Sample Results for the Des Bee Dove Revegetation Test Plots 1994 - 1997 Executive Summary. This summary requires minor corrections to correctly state the facts. Final sampling of the soil should be conducted and included in the Executive Summary (as per Pacificcorp's commitment stated in a letter dated 3/26/93, located in App XVI). The revised submittal retains Appendix XVI which describes the test plots in greater detail.

TECHNICAL ANALYSIS:

OPERATION PLAN

TOPSOIL SUBSTITUTES AND SUPPLEMENTS

Regulatory Reference: R645-301-233

Analysis:

Field Site Trials

This submittal indicates that reclamation will incorporate the results of studies conducted from 1990 through 1995 and has incorporated conclusions from the 1992 test plots located on the haul road. The Sample Results for the Des-Bee-Dove Revegetation Test Plots is located in Vol 2, Part 4, App VIII. Also retained is the description of the development of the test plots, located in Vol 7, App XVI. The location of the information is clearly indicated on page 4-7 of the MRP. The information in the executive summary contains some errors of fact that must be corrected:

- Live Earth was applied at 1,000 lbs/acre (as described by a letter dated 2/4/92, page 67 of App XVI; see also pages 58 and 68, App XVI).
- Rock Soil was applied at a rate of 1CY/plot or 1 CY/140 sq ft or 311 CY/acre (see page 58 of App XVI).
- Exact seed mixes are listed and should be included in the seed mix lists of the Executive Summary or a reference to their location on pages 71 - 79 of App XVI should be made.
- A summary of the initial soil conditions should be included as the nature of the soil is crucial information for interpretation of the results of the test plots. (Initial soil sampling information is located in App XVI pages 80 through 83).
- Final soil sampling must be included in the executive summary as per commitment in a letter dated 3/26/93 (see page 70 of AppXVI).
- A statement is made in the summary that the "Live Earth" plots had additional treatments that may have contributed to their success. The nature of these additional treatments should be disclosed.

Findings:

Prior to approval, the permittee must make the requisite changes to the Executive Summary provided as Vol 2, Part4, App VII. in accordance with **R645-301- 233.340**, results of the physical and chemical analyses and field-site trials of the topsoil and overburden materials as described in the Mining and Reclamation Plan:

RECOMMENDATION

This submittal is not recommended for approval at this time.