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State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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July 15, 1998

TO: File

THRU: Daron Haddock, Permit Supervisor

FROM: Paul Baker, Reclamation Biologist

RE: Haul Road Bond Release, PacifiCorp, Des Bee Dove Mine, ACT/015/017-BR98, Folder #2, Emery County, Utah

SUMMARY:

PacifiCorp has submitted a proposal to delete the Des Bee Dove haul road from the permit area. Numerous maps have been revised to accommodate this deletion, and much of the text has also been changed. Some of the text changes are not directly associated with the haul road; many simply update the plan to show current conditions at the site. A few are substantive, however.

This review does not consider every change made to the plan, and some problems may be found when the Division and operator begin to insert this proposal into the mining and reclamation plan.

TECHNICAL ANALYSIS:

ADMINISTRATIVE INFORMATION

RIGHT OF ENTRY

Regulatory Reference: R645-301-114

Analysis:

Right of entry information has been updated and now includes metes and bounds descriptions for the sediment pond access road area. Portions of the road right of way would still be in the permit area near the sediment pond.

It appears the applicant has taken the necessary steps to transfer and modify

rights of way, and the application contains letters to this effect from the Bureau of Land Management, the School and Institutional Trust Lands Administration, and the Forest Service. However, the application text does not mention right of way U-53809 except in a table on page 1-14 showing other permits. The application needs to show what rights are given by this right of way and how this relates to the road right of way which would overlap with the disturbed area boundary. Because of this overlap, there is a potential for conflict between the applicant and road users or the county.

Findings:

Information provided in the application is not considered adequate to comply with the requirements of this section of the regulations. Prior to approval, the applicant must provide the following in accordance with:

R645-301-114, The applicant needs to clarify its right of entry on right of way U-53809 and include this in the text. The disturbed area would overlap with the road right of way in this area, and there is a potential for conflict between the applicant and road users or the county.

RECLAMATION PLAN

REVEGETATION

Regulatory Reference: R645-301-341

Analysis:

The applicant proposes to delete the haul road vegetation study currently contained in Appendix XVI. For this study, the test plots were established in 1992 near the haul road, and they have been monitored a few times since then. Several different methods were used on these -plots, and there is valuable information in the history.

Appendix XVI should be retained in the plan, and the applicant needs to provide a concluding summary report about the plots. The most recent report in the Division's files is from 1995, only three years after the plots were established. The applicant should take quantitative data from the plots, analyze this data, and make conclusions about what treatments have been most successful.

The application includes other changes to the reclamation plan. Primarily, tree and shrub seedlings are being deleted from both interim and final revegetation planting mixes, and shrubs would be established from seed. No methods for establishing trees are included in the plan, but they are not needed. The proposed changes are acceptable.