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April 10, 1989

TO: Richard V. Smith, Acting Permit Supervisor

FROM: Pamela Grubaugh-Littig, Reclamation Engineer pgl

RE: Reclamation of the Wilberg/Cottonwood/Des-Bee-Dove Haul Road (Review of April 5, 1989 Submittal), Des-Bee-Dove Mine, ACT/015/017, and Wilberg/Cottonwood Mine, ACT/015/019, Utah Power and Light Company, Folder #2, Emery County, Utah

Background

The Des-Bee-Dove Junction Road was constructed in 1983, in response to public concern for safety in the previous route that went through the residential streets of Orangeville, Utah. Utah Power and Light Company (UP&L) represented the road as a public road and failed to obtain a permit from the regulatory authority to construct the haulroad. UDOGM issued a notice of violation (NOV) to UP&L on July 18, 1984, that required the haul road to be included in the PAP for a permanent program permit. On July 31, 1984, UDOGM issued a cessation order preventing UP&L from using the road. The cessation order was terminated October 1, 1984. The Utah Board of Oil, Gas and Mining reopened the haulroad under an emergency order pursuant to the approved Utah State Program, to allow UP&L to resume production and delivery of coal to the Hunter Power Plant without routing trucks through the town of Orangeville. The permanent program permit was issued on Augusut 29, 1985.

During the mid-term review, the details of the reclamation of the Wilberg/Cottonwood, Des-Bee-Dove Mine Haul Road were requested. The reply was a commitment by UP&L to submit detailed reclamation plans by March 31, 1989. An extension of one week was granted by the Division for submittal of these plans, and they were submitted on April 5, 1989.

Synopsis

The recent submittal contained a short narrative stating that the Wilberg/Cottonwood/Des-Bee-Dove Haul Road will be reclaimed from Station 122+50 to Station 242+50. The reclamation will involve removal of the road base, removal of culverts, and reestablishment of the drainages. The submittal, however, requires more detail.

Analysis

Portions of the Wilberg/Cottonwood/Des-Bee-Dove Haul Road that will be reclaimed have been identified in the text. Final reclamation plans are shown on Plate 5-2, 4 sheets, Drawing CM-10601-DS. There are deficiencies and discrepancies that must be addressed in the text and/or the plates.

The mass balance calculations for the haul road must be shown in a table in the text. Yardages hauled must be consistent on the final reclamation drawings, in the table, and in the reclamation bond estimate (Section 3-E and 3-F).

The amount of asphalt and road base removed is only shown on sheet 1 of 4 and must be included on the other three sheets of Drawing CM-10601-DS. The amount of road base and asphalt removed must be accurate and used to calculate the reclamation cost estimate (Section 3-E and 3-F).

The culvert removal must be calculated in the reclamation bond estimate.

The reclamation schedule must accurately reflect the amount of time required to reclaim the haul road; i.e., about two-and-a-half to three months.

Riprap costs for the drainages must be included in the reclamation cost estimate.

The revegetation of this area must be included in the reclamation bond estimate.

Recommendation

The haul road submittal is deficient. All of the items identified in the analysis must be addressed.

djh
AT4/42-43