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# State of Utah

DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF OIL, GAS AND MINING

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August 31, 1989

Mr. David R. Smaldone, Director  
Permitting, Compliance and Services  
Mining Division  
Utah Power and Light Company  
P. O. Box 26128  
Salt Lake City, Utah 84126-0128

Dear Mr. Smaldone:

Re: Initial Completeness Review, Waste Rock Storage Facility Addition, Utah  
Power and Light Company, Cottonwood/Wilberg Mine, ACT/015/019,  
Folder #2, Emery County, Utah

Attached is the Initial Completeness Review (ICR) and Preliminary Technical Deficiencies for the proposed Waste Rock Storage Facility Addition at the Cottonwood/Wilberg Mine. In order to complete this permitting action in a timely manner, please assure that responses completely address each deficiency identified in the ICR. The Division looks forward to receiving the complete response by no later than September 15, 1989.

Sincerely,

A handwritten signature in cursive script that reads "Richard V. Smith".

Richard V. Smith  
Permit Supervisor

djh  
Attachment(s)  
cc: A Team, DOGM  
AT68/2

**INITIAL COMPLETENESS REVIEW  
COTTONWOOD/WILBERG MINE WASTE ROCK  
STORAGE FACILITY ADDITION  
ACT/015/019**

**Utah Power and Light Company  
Emery County, Utah  
August 31, 1989**

**UMC 771.23 Permit Application: General Requirements for Format  
and Content-(WJM/PGL)**

(d) The applicant must indicate the names, addresses, and position of the officials of each private or academic research organization or government agency consulted by the applicant in preparation of the application for information on land uses, soils, geology, vegetation, fish and wildlife, water quality and quantity, air quality and archeological, cultural, and historical features.

While such information was provided on soils, vegetation, archeology, and subsidence, other information was not fully itemized. Preferrably this should be sumamrized in one section of the PAP (UMC 771.23).

**UMC 771.27 Verification of Application-(PGL)**

The applicant must submit a verification of application for inclusion in the PAP. The engineer's certification on page 1-19 is not signed. Please submit signed application for inclusion in the PAP.

**UMC 782.13 Identification of Interests-(PGL)**

(a)(1) The address of the applicant given on page 1-26 is different from the notice shown on page 1-17. Please correct.

**UMC 782.15 Right of Entry and Operations Information-(PGL)**

The applicant must include the appropriate right-of-entry documents by type and date of execution, the specific lands to which the document pertains, and explain the legal rights claimed by the applicant.

**UMC 783.15 Ground-Water Information-(RVS)**

(a)(3) The applicant must provide water quality data for ground water encountered during the drilling program.

### **UMC 783.19 Vegetation Information-(BAS/WJM)**

(a) Please provide information, adequate to predict the potential for re-establishing vegetation.

Please elaborate on the description of cover transects, provided on page 8-6, and clarify "random and regular placement of sampling plots."

In the introduction of Chapter 8, please provide a table or narrative, stating the acreage of each vegetation type to be disturbed and total acreage of proposed disturbance.

The applicant must include in the PAP a statement of range site condition and productivity for all vegetation types occurring at the waste rock storage facility.

### **UMC 783.21 Soil Resources Information-(HS)**

(a)(1, 2, & 3) The soils characterized by Tom Furst must be correlated with the most recent published or unpublished National Cooperative Soil Surveys. Additionally, the applicant must identify (percentage, pedon descriptions) soil phases and inclusions within a particular soil type. Limiting factors within soil types may be the result of phase and inclusion variation. Each inclusion and phase within the soil type proposed to be removed must be reported separately, mapped, and have physical and chemical analyses performed (Division Guidelines for Management of Topsoil and Overburden for Underground and Surface Coal Mining, Table 1).

(a)(4) The applicant must provide the present and potential productivity of the soil types to be disturbed.

### **UMC 783.24 Maps: General Requirements-(PGL)**

(a) The applicant must indicate current ownership about coal leases; e.g. Northwest Carbon is shown on Plate 1-2 and should be updated.

Plates 1-1 and 1-2 show the Cottonwood/Wilberg Mine permit area incorrectly. All maps that delineate the Cottonwood/Wilberg Mine permit area must include Section 27 NE1/4. Please correct all appropriate maps.

Plate 4-1 indicates the "property" boundary. The section between the State Road and the property boundary (more appropriately called "Lease or ROW Boundary") should be identified.

### **UMC 783.25 Cross-Sections, Maps and Plans-(RVS)**

(a) The applicant must provide cross-sections, maps and plans showing the elevations and locations of test borings and core samplings associated with the geotechnical investigation.

### **UMC 783.27 Prime Farmland Investigation-(HS)**

(b)(5) The applicant must obtain written verification from the State Soils Scientist (Soil Conservation Service) regarding a negative prime farmland determination for the lands within the planned disturbed area.

### **UMC 784.13 Reclamation Plan: General Requirements-(BAS/WJM)**

(b)(1) Please provide a reclamation timetable similar to the one in the Division's "Revegetation Guidelines", Appendix A.

(b)(4) The applicant must provide designs, cross sections, dimensions and minimum and maximum slope for the proposed topsoil and subsoil stockpiles.

The applicant must provide an adequate isopach map delineating depth of topsoil removal from each area of disturbance. Topsoil salvage may be directly related to soil phase and inclusion variations (i.e., rock outcrops, natric horizons, etc.). Additionally, soils must be analyzed for the constituents outlined in the Division Guidelines for Management of Topsoil and Overburden, Table 1, down to the depth of planned excavation.

Please explain the methods and equipment employed to exact depth of soil removal.

(b)(5)(v) Please provide a commitment to have all straw, hay or seed used at the waste rock storage facility inspected by a state Department of Agriculture inspector.

(b)(7) The applicant must develop a plan to include an operational and final reclamation plan, to identify and ensure that all acid- and/or toxic-forming materials and materials constituting a fire hazard are disposed of in accordance with UMC 817.48, UMC 817.71-.75 and UMC 817.103.

### **UMC 784.14 Reclamation Plan: Protection of the Hydrologic Balance-(RVS/TM)**

The applicant must provide plans for sediment control for all areas not draining to a sediment pond. These areas may be identified as alternative sediment control areas (ASCAs). This includes both the access road and the soil berms.

The applicant must also provide a plan for the collection, recording, and reporting of surface water data. Namely, identification of UPDES discharge points and monitoring points for compliance with reclamation effluent standards.

The applicant must provide a plan for the collection, recording, and reporting of ground-water data.

The applicant must provide a plan for the control of ground-water drainage into, through, and out of, the proposed permit area. In particular, the applicant must provide plans for temporarily and permanently sealing boreholes according to UMC 817.13 through UMC 817.15.

The applicant must provide a more comprehensive determination of the probable hydrologic consequences of the proposed coal mining activities. Specifically, the applicant must address potential impacts to the quantity and quality of surface and ground-water resources, including a discussion of possible changes in TDS, TSS, ion, pH, and manganese.

#### **UMC 784.15 Reclamation Plan: Postmining Land Use-(BAS/WJM)**

(a) & (b) Please discuss postmining land use in Chapter 10, per the requirements of this section.

#### **UMC 784.16 Reclamation Plan: Ponds, Impoundments, Banks, Dams and Embankments-(TM)**

The applicant has not provided detailed drawings and cross sections of the sediment pond. This pond must include two separate spillways, a primary standpipe and an open riprapped emergency channel. The current regulations require two separate spillways unless a single non-erodible emergency spillway through the embankment is used.

An accounting based on each watershed subbasin to cross check calculations for the Universal Soil Loss Equation and for the selection of curve numbers is required. This accounting must reference a plate delineating watershed subbasin parameters. This accounting must include vegetation and soil types used in the selection.

#### **UMC 784.19 Underground Development Waste-(PGL)**

(b) The applicant must submit the results of the geotechnical investigation for the proposed disposal site.

### **UMC 784.21 Fish and Wildlife Plan-(BAS/WJM)**

(a)(1) The PAP must address the concern that big game migration corridors may be disrupted by the waste rock storage facility, or that deer/highway mortality may increase as a result of increased traffic.

The applicant proposes to clear and reseed 15 acres of pinyon/juniper habitat as compensation for taking 25 acres out of production as mule deer winter range. The Division of Wildlife Resources (DWR) recommends that three acres be enhanced for each acre disturbed, because the winter range is critical-valued and additionally, as compensation for talus deposition in Newberry Canyon. Please augment your mitigation plan to satisfy DWR concerns.

(b)(1) Please discuss the occurrence of canyon sweetvetch on or near the permit area. Please reference the page and map numbers on this subject from the Cottonwood/Wilberg Permit Application Package (PAP).

### **UMC 784.22 Diversions-(TM)**

The applicant must provide cross-sections and longitudinal profiles of all diversions and cross-sections of any natural channels disturbed by the access road or pile, and recreated during reclamation based on natural channel characteristics.

### **UMC 784.23 Operation Plan: Maps and Plans-(PGL)**

The applicant must indicate the land for which the performance bond will be posted. The disturbed area on Plate 4-1 could indicate in the legend that the bonded area is the disturbed area.

All certified maps must have the proper certification; stamp, signature and date. Please correct all maps accordingly.

**PRELIMINARY TECHNICAL DEFICIENCIES  
COTTONWOOD/WILBERG MINE WASTE ROCK  
STORAGE FACILITY ADDITION  
ACT/015/019**

**Utah Power and Light Company  
Emery County, Utah  
August 31, 1989**

**UMC 817.97 Protection of Fish, Wildlife, and Related Environmental Values-(BAS/WJM)**

(b) Please provide a commitment in the PAP to report to the Division the presence of any threatened and endangered plant or animal, or any bald or golden eagle, which has not been previously reported.

**UMC 817.112 Revegetation: Use of Introduced Species-(BAS/WJM)**

Please justify the use of introduced species in both interim and final revegetation seed mixes, per the requirements of this section.

**UMC 817.113 Revegetation: Timing-(BAS/WJM)**

(a) Please include a commitment in the PAP to seed immediately after final site preparations and during the first normal period for favorable planting conditions.

**UMC 817.114 Revegetation: Mulching and Other Soil Stabilizing Practices-(BAS/WJM)**

(a) Please provide a commitment in the PAP to mulch and anchor that mulch at the rate described on page 3-10, on any topsoiled area where seeding will not occur for a month or longer.

**UMC 817.116 Revegetation: Standards for Success-(BAS/WJM)**

(a) Reference areas must be permanently and visibly staked in the field. The PAP (page 3-12) must provide such a commitment.

The applicant must commit to reassessment of all reference areas every five years.

(b) Please revise revegetation success standards to correspond to the soon-to-be-adopted Rules. On page 3-12, under 3., sample adequacy must be satisfied for the parameter of productivity. Please change the confidence interval from 80 percent to 90 percent, on page 3-12 under 4., and on 3-13 under 6.