



# State of Utah

DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF OIL, GAS AND MINING

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July 18, 1989

TO: Susan Linner, Permit Supervisor

FROM: James Leatherwood, Reclamation Soils Specialist 

RE: Permit Renewal, Valley Camp of Utah, Belina Complex,  
ACT/007/001, Folder No. 2, Carbon County, Utah

## SUMMARY

The Permit Renewal Application for the Belina Mine Complex, received June 30, 1989, has been reviewed concerning soil concerns. The submittal cannot be considered complete or technically adequate at this time. Maps, cross-sections and referenced appendixes in addition to discussion pertaining to Condition 5 and 6 were not included within the submittal. The Permit Renewal Application cannot be thoroughly reviewed until the following information has been included within the text of the submittal.

## ANALYSIS

### UMC 783.21 Soil Resource Information - JSL

The Permit Renewal Application package did not include a map delineating the soils, within the permit area, that may be affected by the mining operations.

The submittal did not contain any language pertaining to the in-place testplot program as required by Conditions 5 and 6 of the past five year permit. Cross-section and maps identifying the potential suitable growth material in addition to the potential suitable growth material sample location points, mass balance and analysis must also be included as part of the Permit Renewal Package.

### UMC 783.24 Maps: General Requirements - JSL

### UMC 783.25 Cross-Sections, Maps and Plans - JSL

No cross-sections or maps were submitted within the Permit Renewal Application. A thorough and adequate review pertaining to soil issues cannot be addressed until complete and accurate maps are included within the submittal.

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UMC 783.27 Prime Farmland Investigation - JSL

The negative prime farmland determination, reference under R614-301-221, was not included within the Permit Renewal Application. The negative determination from the Soil Conservation Service must be included within the submittal.

UMC 817.22 Topsoil: Removal - JSL

The submittal fails to address the requirements of Conditions 5 and 6 from the previous five year permit. As previously mentioned under UMC 783.21 and UMC 783.24-.25, the location of the potential suitable growth material must be delineated on an appropriate cross-sections and maps. The volume of potential suitable growth material in addition to the location of the sample points must be defined. The potential suitable growth material analysis referenced to appendix R614-301-231.200a, not found within the submittal, must be included for review. In addition, a complete description pertaining to the proposed test plots, As-builts, seed mix, soil fertilizer analysis data, fertilizer rate and application methodology, and methodology of seed placement must be embodied within the Permit Renewal Application.

The Permit Renewal Application must also change the term "topsoil" to "suitable growth material" as required under previous Division correspondence to Mr. Barry Barnum, August 28, 1989, to partially fulfill the requirements of Conditions 5 and 6.

R614-301-231.200, page 20 of the Permit Renewal Application must be updated. The suitability of any potential suitable growth materials must be compared to the Utah Divisions of Oil, Gas and Mining Topsoil suitability criteria found within the Guidelines for Management of Topsoil and Overburden for Underground and Surface Coal Mining.

UMC 817.23 Topsoil: Storage - JSL

The permit Renewal Application must reference the seed mix used to revegetate and stabilize the existing suitable growth material stockpile at the Belina Mine Complex. The submittal must also include maps, and cross-sections identifying the location and the design of the stockpile.

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UMC 817.24 Topsoil: Redistribution - JSL

The suitable growth material redistribution plan is totally dependent upon the outcome of the test plots required under Condition 5 and 6. This should be noted within the redistribution plan.

The plan states that topsoil will be redistributed on prepared areas but does not define the preparation techniques to be employed. The Division recommends ripping the surface at an 8 to 12 inch depth at a spacing width of 15 inches for proper topsoil redistribution preparation.

UMC 817.25 Topsoil: Nutrients and Soil Amendments - JSL

The fertilizer plan within the Permit Renewal Application for the Belina Mine Complex should be updated to reflect the outcome of the existing test plots installed at the Belina Mine Complex.

RECOMMENDATIONS

The Permit Renewal Application should not be approved until the above concerns have been completely and adequately addressed.

cc: R. Summers  
L. Kunzler  
51/93-95