



State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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November 11, 1988

TO: Susan Linner, Permit Supervisor

FROM: Lynn Kunzler, Reclamation Biologist *LK*

RE: Review Reclamation Plan for Sowbelly Gulch, Castlegate Coal Company, Castlegate Mines, ACT/007/004, Folder #2, Carbon County, Utah.

Summary:

The MRP for the Castlegate Mines has been reviewed for adequacy of the revegetation portion as it relates to Castlegate Coal Co.'s plans to reclaim Sowbelly Gulch during the next construction season. Below are comments that need to be addressed prior to reclamation activities.

Analysis:

UMC 784.13(b) Revegetation Plan - LK

The schedule for revegetation (Chapter 9, page 72) is not acceptable in that it does not identify each major step in reclamation (i.e., backfilling and grading, topsoil replacement, seedbed preparation, seeding, mulching, planting, etc. as required by UMC 784.13(b)(1) and (b)(5)(i), and the proposed timing is not during the normal period for favorable planting as required by UMC 817.113(a). Please provide an appropriate schedule for revegetation identifying the approximate dates and time frames for each major step in reclamation (refer to the Division's Draft Revegetation Guidelines to aid you in developing an acceptable schedule.

Page 58 (chapter 9) indicates straw mulch will be applied at a rate of 1500 - 2500 lbs. per acre. Please note, the minimum acceptable rate for mulch is 2000 lbs. per acre. Also, all mulch must be appropriately anchored. Please identify how mulch will be anchored on areas where crimping is not practical or possible. Also, it is recommended that the mulch source be identified early to allow sufficient time to have the materials tested for noxious weed seed. This has been problem in the past few years with straw mulch.

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It is assumed that Castlegate will broadcast seed the entire site (see page 59, Chapter 9). If Castlegate intends to use other seeding areas for all or part of the seeding work, the alternative method(s) and areas where they will be used needs to be identified.

Exhibit 3.2-3, the post mining reclamation map for Sowbelly Gulch, is in apparent conflict with the proposed seeding plan and the vegetation communities to be re-established. Page 61 (Chapter 9) identifies that seed mix #4 will be used for the entire site and that planting list #2 will be used along any drainages. This map needs to be corrected. Also, as requested in your October 18, 1988 letter, the Division feels that the above referenced seed mix has sufficient quick-growing species that the addition of an annual grass is not needed.

It is recommended that a seed/plant materials supplier be retained several months in advance to assure procurement of the required revegetation materials. Since we are still experiencing problems with seed suppliers not providing the species or quality of seed materials as listed on the seed labels, please make arrangements to have the State Agriculture Inspector collect a sample for analysis. This testing will be done at no cost to the mine. The Division can assist in arranging for this test if needed.

The current plan does not address protection of reclaimed areas from grazing (domestic) animals and wildlife. Due to the past experiences at the 'Goose Island' reclamation site, it is suggested that fencing or other appropriate protection be implemented to protect the area from grazing until vegetation is established.

Finally, It will be necessary to have the current range condition of the reference area for this site re-evaluated during the 1989 field season. This can be done by a qualified consultant or the U.S. Soil Conservation Service (preferably the SCS). If current range condition is not in fair or better condition, appropriate management practices will be required.

UMC 817.133 Postmining Land Use - 1k

Please justify the retention of the road through the reclamation site, demonstrating the utility of this road in meeting the postmining land use of grazing and wildlife habitat. If sufficient justification is not made, the Division will require reclamation.

cc: D. Darby
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