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TO: Susan C. Linner, Permit Supervisor

FROM: James Leatherwood, Reclamation Soils Specialist

RE: Sowbelly Reclamation Project, Price River Complex, Castle Gate Coal Company, ACT/007/004, Carbon County, Utah

SUMMARY

The recent Mid-Term Permit submittal, received April 28, 1988, has been reviewed for completeness and adequacy relative to the proposed Sowbelly reclamation project. Several adequacy issues exist and must be resolved. The primary issue is the proposed use of an unsubstantiated substitute topsoil material. This material must be analyzed to allow the Division to determine the soil material as a potential substitute material capable of reclamation success . Other issues include the location of substitute topsoil, depth of scarification and soil redistribution requirements.

RECOMMENDATIONS

UMC 817.22(e) Topsoil: Removal - JSL

The Division has not received any potential substitute topsoil data. This information is required for reclaimability findings and to adequately evaluate an appropriate soil management plan for the reclamation of Sowbelly Canyon.

The location(s) and volume(s) of the potential substitute topsoil source(s) is not clearly defined. If potential substitute topsoil is to be derived from Crandall Canyon, the operator must clearly delineate the location and volume of material to be moved to Sowbelly for final reclamation.

UMC 817.24 Topsoil: Redistribution - JSL

The depth of scarification should be clarified. The depth of scarification must be determined by the depth of available soil, total length of effective root growth and any hard pan remidiation.

Soil redistribution should be carried out when the soil is dry to reduce the potential for redistribution compaction.

cc: D.Darby
BT51/15-16