



State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

Norman H. Bangertter
Governor

Dee C. Hansen
Executive Director

Dianne R. Nielson, Ph.D.
Division Director

355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203
801-538-5340

October 13, 1988

TO: Susan Linner, Permit Supervisor

FROM: James Leatherwood, Reclamation Soils Specialist

RE: Castle Gate Mid-Permit Term Review, April 28, 1988
Submittal, Price River Complex, Castle Gate Coal
Company, ACT/007/004, Carbon County, Utah

SUMMARY

The Mid-Permit Term Review, received April 28, 1988, has been reviewed for completeness and adequacy of responses to issues raised in the February 19, 1988 review. Many of the previous issues have been adequately addressed, however, the following issues remain to be resolved. The following should be included as conditions to the Mid-Permit Term Review Approval.

UMC 784.13 Reclamation Plan: General Requirements - JSL

The April 25, 1988 response refers to page 53 of chapter IX that was amended to include a commitment to reduce compaction. Page 53 of chapter IX was not included in the April 28, 1988 submittal. A commitment to reduce compaction must be included in the Mining and Reclamation Plan (MRP).

UMC 817.22(E) Topsoil: Removal - JSL

To date the Division has not received any alternative re-soil material sample results. Samples were to be taken by late summer of 1984. The analysis must be submitted to the Division immediately.

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The April 28, 1988 submittal fails to define the specific parameters for all re-soiling material analysis. The submittal refers the reviewer to section 3.4-4(1). This section defines the parameters required for the waste material disposed in Schoolhouse Canyon. The applicant must analyze all potential re-soiling material for the following parameters: pH, USDA textural class, electrical conductivity, sodium adsorption ratio, boron, selenium, percent rock fragments, percent calcium carbonate, saturation percentage, available phosphorous and potassium. This information is required before any reclamation activity can begin in Sowbelly Canyon.

UMC 817.24 Topsoil: Redistribution - JSL

The applicant's committal to redistribute six inches of soil over the waste material is not adequate. As stated previously in section 3.4-4(1) of the MRP, a redistribution depth of 1.5 feet of non-toxic material will be placed over the waste at Schoolhouse Canyon prior to distributing six inches of re-soiling materials for a total depth of two feet. Unless the requested soil analysis data or other information proves otherwise, the operator must redistribute 1.5 feet of non-toxic material over the waste material at Schoolhouse Canyon, and then distribute six inches of re-soiling material over the 1.5 feet of non-toxic material.

cl
cc: D. Darby
WPOB51/13-14