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State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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Salt Lake City, Utah 84180-1203
801-538-5340

March 13, 1992

Mr. Richard H. Allison, Jr. P.E.
Project Supervisor
Amax Coal Company, Belle Ayr Mine
2273 Bishop Road
P. O. Box 3005
Gillette, Wyoming 82717-3005

Dear Mr. Allison:

Re: Dyer's Woad at Hardscrabble Canyon, Amax Coal Company, Castle Gate Mine,
ACT/007/004, Folder #2, Carbon County, Utah

I was glad to meet you yesterday and to review some of the plans for reclamation at Hardscrabble Canyon and Sowbelly Gulch. I am concerned about the presence of dyer's woad, a state-declared noxious weed, at Hardscrabble Canyon. Like most weeds, this plant takes advantage of disturbances to spread. It is a very serious problem on many rangelands in northern Utah. The seeds of the plant emit allelopathic chemicals as they decompose and germinate that inhibit the germination of other seeds. This could reduce the chances for reclamation success at Hardscrabble.

While this plant is a serious pest, it is relatively easy to control in small areas or when the concentration is not too great. It is normally a biennial, sometimes an annual or short-lived perennial, and can be controlled by digging or pulling it up or by spraying it at the proper time with a chemical, such as 2,4-D. The plants are easily identified either when they start to bolt and flower, which is a good time to spray them, or when they are in bloom at which time it is too late to spray. However, they can usually be pulled or dug without too much trouble when in bloom.

Your plan states that a plan to control disease or pests will be developed with the Division should a problem arise. I encourage you to develop such a plan to avoid possible future problems with this weed. The plan that I have suggested above would be acceptable if anyone involved with chemical spraying has read and will follow the herbicide label and is familiar with the equipment that he would use.

Page 2
ACT/007/004
March 13, 1992

If you need further information, please call me at the above number or contact Mr. Stephen Burningham, state weed specialist, with the Utah Department of Agriculture, at (801)-538-7183.

I am also including a copy of the air quality permit, which I found during research at the Division of Air Quality.

Yours truly,

A handwritten signature in black ink, appearing to read 'Paul Baker', written in a cursive style.

Paul Baker
Reclamation Biologist

mbm
Enclosure
DYERWOAD.LTR