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August 23, 1995

TO: Daron Haddock, Permit Supervisor

FROM: Steven M. Johnson, Reclamation Hydrologist *SMJ*

RE: Draft Review, Pond Removal, Castle Gate Mine, AMAX Coal Company,  
ACT/007/004, Working File, County, Utah

*7#2*  
*95F*

**SYNOPSIS**

AMAX Coal has submitted an amendment to the reclamation plan of Sowbelly Canyon that would allow them to remove the sediment ponds during the Phase I reclamation activities. Prior to this amendment AMAX had planned to maintain the sediment pond until after Phase II bond release.

**ANALYSIS**

**RECLAMATION PLAN**

**HYDROLOGIC INFORMATION**

Regulatory Reference: R645-301-760

**Analysis:**

AMAX has submitted new maps that show the Phase I Sowbelly Canyon surface configuration to be the same as the final configurations (Exhibit 3.2-4). This means that the sediment ponds (016 and 017) would be removed and all, or nearly all, grading of the main areas in Sowbelly Canyon would be completed before Phase I bond release. Text revisions in this amendment say that the ponds would be removed and alternate sediment control measures of deep gouging, and 2 tons/acre of hay mulch will be put in place. The area would be seeded with seed mixes #1 and #5 and 1 ton/acre straw mulch placed on the surface. By completing the pond removals now, AMAX hopes to eliminate the need for redisturbing areas after sediment control has been met.

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**Findings:**

Deep roughening, mulching and seeding in lieu of sediment ponds is best technology currently available for sediment control. This practice is proven to be effective in control erosion and, therefore, sediment. Further, the amount of redisturbance that would be required in removing the sediment ponds could be as much as 20% of the total area treated by the ponds. By eliminating the need for redisturbing vegetated areas later, sediment will be controlled more continually throughout the reclamation of the area.

**RECOMMENDATION**

This amendment should be approved. By regrading the sediment ponds at this stage of reclamation, AMAX will avoid large amounts of disturbance in the future. Regrading Pond 017 will also aid in eliminating excess fill over which SBRD-4 flows, bringing it back to the designed profile.

SOWPOND.SJ