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State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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May 19, 1995

TO: Daron Haddock, Permit Supervisor

FROM: Paul Baker, Reclamation Biologist *PBB* *#2*

RE: Draft Review, Response to Item #1 of Division Order 94A, Castle Gate Mine, Amax Coal Co., ACT/007/004-95C, Working File, Carbon County, Utah

SYNOPSIS

Item number 1 of Division Order 94A requires Amax Coal Co. to update its mining and reclamation plan to eliminate conflicting information in the plan, to differentiate between existing and proposed facilities and activities, and to ensure that all information to which the plan references is included in the plan. Most changes submitted in response to this part of the Division Order are minor and not substantive. However, Amax also used the opportunity to make changes to the species lists in Chapter 9. There are a few errors in some parts of this submittal.

Revised Chapters and Sections reviewed for this memorandum are Chapters 1, 2, 4, 5, 8, 9, and 10, and Section 3.1. The memorandum only discusses substantive changes and places where the information is incorrect or conflicting.

The Division Order also required Amax to revise its mining and reclamation plan for Crandall Canyon and to submit bonding information for the entire area. The Division received a revised plan for Crandall Canyon on April 20, 1995, but there is no new bonding information for the entire area.

ANALYSIS

GENERAL CONTENTS

Regulatory Reference: R645-301-100

Analysis:

Most of the proposed changes to the plan are to update and correct formatting and indexing problems.

On February 16, 1995, the Division received updated ownership and control information for Chapter 2, and this information has not yet been approved and inserted into



Page 2
ACT/007/004-95C
May 19, 1995

the plan. Changes to Chapter 2 in the current submittal are intended to update the February 16, 1995, submittal, so these changes do not correspond with information in the current mining and reclamation plan. The Division needs to finish its review of the February submittal before the April submittal can be inserted into the plan.

The List of Exhibits for Chapter 2 includes Exhibit 2-2, Mining Progression No. 2 Mine. The exhibit is the mining progression map for the No. 5 Mine.

The acreage figures in Table 3.1-2 do not correspond with figures in other parts of the plan. For example, this table indicates the disturbed areas in Sowbelly Gulch and Hardscrabble Canyon are 16 and 24 acres, respectively, but Sections 3.2 and 3.3 say the areas are 21 and 39 acres. The acreage figures are associated with bonding which is item No. 8 of the Division Order. They should be corrected as part of any submittal to address this requirement.

Findings:

The Division has not yet approved the updated ownership and control information submitted in February. Some of the changes in the April amendment application update the February submittal.

In addition, the following item needs to be corrected:

1. The list of exhibits for Chapter 2 includes Exhibit 2-2, Mining Progression No. 2 Mine. The exhibit is the mining progression map for the No. 5 Mine.

REVEGETATION

Regulatory Reference: R645-301-340

Analysis:

Revegetation Methods

Amax has added species list 5 to its seed/planting mixtures in Chapter 9. The amendment application says list No. 5 will be used to seed areas within 20 feet of the edge of reclamation channels.

Species list 3 was originally designated for riparian areas and for those areas near reclaimed channels. However, this list was designed for a perennial stream (the Price River) and not for the intermittent/ephemeral channels in Sowbelly Gulch and Hardscrabble and

Crandall Canyons. Species list 5 is more appropriate for non-perennial drainages.

In addition, species list 1 was modified. The amounts of bluebunch wheatgrass and fourwing saltbush seed were increased, thickspike wheatgrass was substituted for salina wild rye, and sand dropseed was deleted. These changes were partly in response to comments from the Division of Wildlife Resources. They were also based on Division observations of first year revegetation in Hardscrabble Canyon and Sowbelly Gulch.

Changes to Chapter 9 should be approved.

Findings:

This section of the amendment application is considered complete and accurate and should be approved.

LAND USE RESOURCE INFORMATION

Regulatory Reference: R645-301-411

Analysis:

The current mining and reclamation plan says, "Active surface disturbance within the mine plan area as a result of Castle Gate Coal Company operations will likely not exceed 150 acres total at any time during the projected life of the operation or 0.005% of the surface because of the very limited extent of aerial disturbances within the total mine plan area." One hundred fifty acres is 0.005% of 3,000,000 acres. Actual disturbed area is about 177 acres which is about 2.3% of the permit area of 7619 acres. The proposed amendment substitutes 0.0005% for 0.005%.

The mining and reclamation plan is required by R645-301-411.110 to contain a map showing uses of the land at the time of filing the application. A sentence in Chapter 4 references several exhibits in various parts of the plan for land use information. This sentence has been deleted. The sentence should be restored except that Exhibit 3-1 is no longer in the plan.

Findings:

The following items need to be corrected:

1. The part of the application indicating 0.0005% of the mine plan area surface is disturbed needs to be corrected. This statement could just be deleted.

Page 4
ACT/007/004-95C
May 19, 1995

2. The plan needs to contain a map showing area land uses. A statement in the current Chapter 4 references several exhibits for this information. This statement should be restored except that reference to Exhibit 3-1 needs to be deleted.

RECOMMENDATIONS

Amax needs to correct a few portions of this application. Corrections to Table 3.1-2 may involve extensive changes to bonding calculations. New bonding calculations are required in item No. 8 of the Division Order.