

# TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

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November 16, 2004

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TO: Internal File

THRU: Wayne Western, Team Lead *WFW*

FROM: *JB* Priscilla Burton, Environmental Specialist III, Soils

RE: Phase I Bond Release Hardscrabble Substation Area, Castle Gate Holding Company, Castle Gate Mine, C/007/0004 Task ID #2037

## SUMMARY:

Castle Gate Holding Company received Phase II bond release for the Hardscrabble No. 3 and No.4 Mine areas of the Castle Gate Mine (37.1 acres) in February 21, 2003. The substation was not included in previous bond release areas. The application received September 14, 2004 requests bond release for the 0.72-acre substation area of Hardscrabble, reclaimed in the fall of 2002. Current bond for Hardscrabble is \$318,100 will be reduced by \$85,000 down to \$235,000 with this approval (Section 3.1, Table 3.1-2).

The application contains a revised Table 3.1-2 Summary of Bonding and Reclamation Costs, channel design (Appendix 3.3O), a prototype for public notice and letters to interested parties (Appendix 3.3R), and a seed list for the site (Appendix 3.3S). Reclamation techniques for the substation are described in MRP section 3.3-4(3) and Phase IV in Section 3.3-5 Reclamation Timetable. The As-Built Reclamation Topography and Cross-section Location Map is Exhibit 3.3-19. The As-Built Reclamation Topography and Treatment Map is Exhibit 3.3-23.

The Utah Regulations allow for Phase I bond release after the completion of backfilling and regrading (which may include the replacement of topsoil ) and drainage control of the bonded area in accordance with the approved plan (R645-301-880.310).

The Permittee has met the minimum requirements of this regulation for Phase I bond release.

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**TECHNICAL ANALYSIS:**

**RECLAMATION PLAN**

**TOPSOIL AND SUBSOIL**

Regulatory Reference: 30 CFR Sec. 817.22; R645-301-240.

**Analysis:**

**Redistribution**

As-Built Reclamation Topography and Cross-section Location Map is Exhibit 3.3-19. Cross sections are found on Exhibits 3.3-20A, B, and C.

No topsoil was applied.

**Findings:**

The information provided meets the requirements for bond release.

**STABILIZATION OF SURFACE AREAS**

Regulatory Reference: 30 CFR Sec. 817.95; R645-301-244.

**Analysis:**

Erosion control for the substation was accomplished by gouging 2 ton/acre noxious weed-free hay into the surface soil; seeding with the mix described in App 3.3S; and mulching with 1.5 ton/acre noxious weed-free straw and 500 lbs/ac of hydromulch and tackifier (Section 3.3-4(3)).

The Division's planned inspection of the site on November 23, 2004, was delayed due to inclement weather. A field inspection will be conducted when snow leaves the ground.

**Findings:**

The information provided in the bond release application meets the bond release regulations.

**RECOMMENDATIONS:**

The 0.72-acre substation site is recommended for Phase I bond release, after a field visit is conducted by the Division to confirm that the Permittee has applied best management practices to control erosion and prevent sediments from leaving the site.

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