



State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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TO: Dianne R. Nielson, Division Director
FROM: Paul Baker, Reclamation Biologist *PAB*
DATE: March 23, 1992
RE: Notice of Violation N92-37-1-1

I apologize for writing you another memorandum on the above violation, but in going through some records for an inspection which I did at Skyline last Thursday, I found a copy of a technical deficiency review done by Lynn Kunzler which discusses what type of revegetation monitoring needs to be performed. Except for the conveyor bench, Skyline appears to have incorporated these comments into their recent permit renewal application package. Pertinent portions are highlighted.

UMC 783.22 Land Use Information - LK

This section is complete

UMC 784.13 Reclamation Plan: General Requirements - LK

The reclamation time table (Table 4.2-1) does not discuss timing of revegetation work. Page 4-35 indicates that revegetation will be undertaken during the spring and early fall. Please note, for best success, seeding should occur late fall (after Oct. 1) and planting of seedlings should occur early spring (as soon as ground thaws - usually mid May). The timetable (and text) should make this clear.

Pages 4-30, 2-114 and Table 2.11-1 refers to areas that will be revegetated by handset seedlings. Yet, there is no species list or stocking levels cited. With exception to these references, the seeding/planting plan appears to cover the entire mine disturbance. These references may be referring to the reclamation of the conveyor corridor slopes. If this is so, it needs to be made clear. Also, the reclamation plan for the conveyor slopes must be in the text of the MRP and not in the Appendix that is identified for consultant reports and/or baseline data, studies, etc. that the plans were derived from.

Page 4-30 indicates that as little as 1,000 pounds per acre of mulch may be used on some areas. Please note, the Division considers a minimum of 2,000 pounds per acre of mulch needs to be applied.

The MRP does not contain a map (map 4.7.2-1 as identified in the index) that shows where the various revegetation treatments will be used.

The revegetation monitoring plan is not adequate. This plan needs to identify what parameters will be monitored and during early reclamation (years 1-3 of the liability period), i.e. survival of transplants should be conducted during the first three years after planting, with permanent transects being established at the time of planting.

This section may not be considered complete until these comments are addressed.