



State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

Norman H. Bangerter
Governor

Dee C. Hansen
Executive Director

Dianne R. Nielson, Ph.D.
Division Director

355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203
801-538-5340

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May 25, 1992

TO: Daron Haddock, Permit Supervisor
FROM:  Priscilla Burton, Soils Reclamation Specialist
RE: Compliance with Division Order. Utah Fuel Co. Skyline Mine. ACT/007/005-92F. Folder #2. Carbon County. Utah.

SUMMARY:

A response to the Division Order vacating N92-37-1-1 was received 5/18/92. Items 2.1 and 2.2 have been adequately addressed. Item 2.3 has not been adequately addressed. The requirement to commit to written annual evaluations of contemporaneous revegetation on the conveyor bench was not clear within the MRP.

ANALYSIS:

ITEM 2.3

A commitment to visually evaluate the treatments annually is stated on page 4-45A.

Results of Experiment 3 (only) will be included in the annual report (pg 4-45A).

A confusing statement on page 4-45 states that "revegetation analyses were conducted annually during the first five years..." A more precise statement would read, "revegetation analyses were conducted annually from 1980 to 1985..." Written this way, the statement absolutely clear.

RECOMMENDATIONS:

Utah Fuel Co. should reword page 4-45 to indicate the years in which annual revegetation analyses were reported to the Division.

At a minimum, page 4-45A should clearly state that visual evaluations of all experimental practices and trials being conducted will be reported in the Annual Report.

Quantitative measures of evaluation would be preferable to visual evaluations, but a revision of evaluation practices is not called for in the scope of Division Order 92F.

