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August 19, 1996

Mr. Keith Zobell  
Utah Fuel Company  
P.O. Box 719  
Helper, Utah 84526

Re: Revegetation Success Standards for the Conveyor Bench and Cuts, Coastal States Energy Company, Skyline Mine, ACT/007/005, Folder #2, Carbon County, Utah

Dear Keith:

I appreciated the chance to meet with you and George Cook on August 7 and to look at the various reference areas for the mine. As you know, we have been trying for some time to find an acceptable way to measure revegetation success on the conveyor bench and cut slopes. At the end of our meeting and for a few days afterward, I have had some ideas that I think could work.

Before changing the revegetation success standard, I think it is necessary to show in the plan what backfilling and topsoiling can and cannot be done. My understanding is that there is little material with which to backfill most of the cut slopes and that the slopes are steep enough that topsoil would simply not stay in place. While I believe this is correct, the plan needs to make this kind of demonstration.

I believe there are two acceptable options for dealing with the revegetation success standard, and we have discussed both of them. The easiest way, but not necessarily the best, would be to include the conveyor with the rest of the mine site when comparing for revegetation success. The average would be lowered, but since the conveyor area is relatively small compared to the rest of the site, the entire site would probably still meet the standard. However, as you know, the reference area has nearly 100% cover, and this may be difficult to meet even with the variability allowed in the regulations.

The other option which I mentioned to you at the end of our meeting is to find an area with similar topography and soils and to use this for comparison. The only kind of area



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that would have similar soils would be an area with a rock outcrop. We need to justify why it is necessary to leave the slopes with rock outcrops, but that can be done. I believe it would be possible to establish as much vegetation as there is in an area with a rock outcrop, but we would still need to find an appropriate reference area.

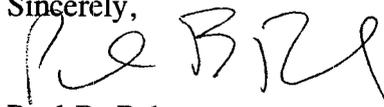
When we were in the aspen reference area near the mine, you pointed to an area to the southwest of us. I walked to this area, and it is an old slump with several rocks exposed. This area may not work, but we can probably find another one in Eccles Canyon.

I discussed the options for changing the success standard with Susan White, and she was in agreement that they could both work. She and Sharon Falvey had some suggestions for revegetation efforts. They thought you should try an erosion matting on part of the slope. In particular, they thought you should try a mat with aspen fibers on part of the area to see if it would decrease evaporation and increase seedling establishment.

Last year in Hardscrabble Canyon at the Castle Gate Mine, we had a company apply a type of hydromulch called Soil Guard as a demonstration. The mulch contained a lot of tackifier, and most of the mulch is still stuck where it was applied. The place where it was applied had little chance for vegetation to become established; however, there are some plants growing in places where I didn't expect anything. I don't think you would want to do the entire area with this, but you might want to experiment. I can find more details if you need them.

Please don't hesitate to call if you have any questions about these suggestions or how to approach the problem of finding a success standard. If you know of an area that might be used as a reference area, I would be happy to come and look at it.

Sincerely,



Paul B. Baker  
Reclamation Biologist

cc: Joe Helfrich

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