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May 5, 1997

TO: File

THRU: Joe Helfrich, Permit Supervisor *JH*

FROM: Robert Davidson, Soils Reclamation Specialist *RAD*

RE: Coal Exploration Plan for Upper Huntington Canyon - Federal Leases U-044076 and U-0147570, Canyon Fuel Company, LLC, Skyline Mine, ACT/007/005-97C, Folder #2, Carbon County, Utah

SYNOPSIS

Canyon Fuel Company, LLC, Skyline Mine has submitted an application for minor coal exploration for two drill sites (97-221 & 97-27-1) located within the the upper Huntington Canyon, Carbon and Emery County, Utah, Federal coal leases U-044076 and U-0147570. The surface rights are controlled by the U.S. Forest Service and the coal rights are controlled by the U.S. Bureau of Land Management. Less than 300 pounds of coal will be removed during the drilling program. The responsibility of the Division of Oil, gas and Mining is to give comments through the U.S. Bureau of Land Management. This document supplies the soils' Technical Analysis.

TECHNICAL ANALYSIS

COAL EXPLORATION: COMPLIANCE DUTIES OPERATIONAL STANDARDS

Regulatory Reference: R645-202-230.

Analysis:

The mine reclamation plan adequately describes the soil resource. Modifications are needed for soil salvage operations and for testing the drill cuttings for acid/toxic forming characteristics. The following technical analysis is made:

- Two coal-exploration drill sites are proposed for upper Huntington Canyon.
- Soil resources are adequately described.

- The plan needs to delineate soil salvage areas and erosion-control methods for stockpiled soils.
- The plan needs to commit to sample and analyze drill cuttings for acid/toxic forming characteristics.

Two coal-exploration drill sites are proposed for upper Huntington Canyon.

Two different drill sites are proposed for the upper Huntington Canyon area and include 97-22-1 and 97-27-1. Two available access routes are proposed: Access Option 1 would require installing a temporary bridge or culvert across Huntington Creek and construction of 3600 total feet of new road. Access Option 2 would require construction of 5100 total feet of new road construction. Estimated disturbance for each drill site is shown in the following table:

Drill Site	Construction	Disturbance acres
97-22-1	Drill Pad	0.10
	Access Road - Option 1	0.45
	Access Road - Option 2	0.93
97-27-1	Drill Pad	0.10
	Access Road - Options 1 & 2	0.71

Soil resource information is adequately described

There are no prime farmlands or alluvial valley floors within the proposed exploration area. Bedrock is exposed in several locations where the soil thickness thins with little or no cover. Soils are generally sandy loams with commonly dark and organic rich surface A and B horizons. Subsoils are mainly loam with a high rock content. Bedrock is exposed in a few places with little to no soil cover. Soil thickness varies with each location with deep to moderately deep soils on ridgetops and valley floors, and shallow to moderately shallow soils on steep hillsides.

The plan needs to delineate soil salvage areas and erosion-control methods for stockpiled soils.

The plan states “topsoil will be salvaged,” with the assumption by the reader that topsoil salvage includes both pad and road construction areas. Generally, the plan explains that salvaged topsoil will be re-distributed during road and site reclamation. Topsoil will be stockpiled adjacent to each site and will be protected from erosion during storage. However, the plan does not specifically identify how the soils will be protected from erosion during storage.

The plan needs to commit to sample and analyze drill cuttings for acid/toxic forming characteristics.

No acid or toxic forming materials are expected to be encountered during drilling with all drill cuttings confined to the mud pit. However, prior to disposal at Canyon Fuel Company, LLC's waste rock disposal area, sample and analyze all drill cuttings for acid/toxic forming characteristics.

Findings:

The permittee must provide the following, prior to approval, in accordance with the requirements of:

R645-202-233, modify the plan to identify exact soil salvage areas and what erosion control methods will be used for stockpiled soils.

R645-202-236, prior to disposal at Canyon Fuel Company, LLC's waste rock disposal area, sample and analyze all drill cuttings for acid/toxic forming characteristics.

**COAL EXPLORATION: COMPLIANCE DUTIES
RECLAMATION STANDARDS
TOPSOIL**

Regulatory Reference: R645-202-241 and R645-202-242.100.

Analysis:

Describe alternate erosion-control measures for protecting the reclaimed soil surface.

After reshaping the land to the approximate original contours, stockpiled soils will be replaced and soil surfaces roughened prior to fertilization and seeding. The plan states that vegetation re-establishment is the primary means to prevent soil erosion. However, the plans fails to explain alternate erosion control measures should vegetation efforts fail to control erosion.

Findings:

The permittee must provide the following, prior to approval, in accordance with the requirements of:

R645-202-235 and R645-202-242, describe alternate erosion-control measures for protecting the soil should vegetation efforts fail to control erosion.