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State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

Michael O. Leavitt
Governor
Ted Stewart
Executive Director
James W. Carter
Division Director

355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203
801-538-5340
801-359-3940 (Fax)
801-538-5319 (TDD)

September 1, 1993

TO: File

THRU: Daron Haddock, Permit Supervisor

FROM: Steven M. Johnson, Reclamation Specialist 

RE: Renewal Responses, Division Order #92A, U. S. Fuel Company, Hiawatha Mines, ACT/007/011, Folder #2, Carbon County, Utah

SUMMARY

On June 9, 1993 U. S. Fuel submitted a revised portion of the Permit Application to address deficiencies outlined by the Division. The revision includes pages 81 and 82 of Chapter II which deal with the reclamation of the road on site. U. S. Fuel requested that canyon roads be retained after reclamation in an unimproved condition to support the post mining land use.

ANALYSIS

R645-301-412 Land Use Reclamation Plan

Proposal:

Canyon roads are to be reclaimed to an unimproved condition by removing and disposing of pavement. Existing drainage structures will be left in place to serve a single lane road.

Analysis:

U. S. Fuel proposes to remove and dispose of pavement from the canyon roads in reclaiming these roads to an unimproved condition. No disposal site is given for the pavement. It is assumed that U. S. Fuel plans to remove all road gravel prior to ripping and seeding the surface. Leaving the soil bare would increase the potential for erosion (i.e. the formation of rills and gullies). The gravel base could be left in place to decrease the erosion potential.

The existing drainage system is proposed to be left in place. U. S. Fuel has not investigated any other options for drainage; however, there are other practices available that could be considered that would decrease the need for maintenance and would still provide the proper drainage.



Deficiencies:

1. U. S. Fuel should supply information about disposal of the pavement. If intended disposal is on-site then plans for burial should be submitted. If U. S. Fuel intends to dispose of the pavement off-site a State-approved solid waste disposal site should be selected, and the Division should be notified of this selection in accordance with R645-301-528.332.
2. U. S. Fuel should justify the need for leaving the existing drainage structures in accordance with R645-301-542.620.

RECOMMENDATIONS

It is recommended that the plan to retain the roads be approved for use in the post-mine land use if U. S. Fuel can address concerns about the disposal of the pavement, and the possible development of rills and gullies after the pavement is removed.

U. S. Fuel should, also, explore possible best management practices (BMPs) for road drainage after the pavement has been removed. It is believed that the demand for maintenance on the existing drainage system would not be economical after the reclamation process is finished.

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