



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

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January 26, 2000

TO: Internal File

THRU: Paul B. Baker, Project Team Lead *PBB*

FROM: Priscilla Burton, Soils Reclamation Specialist *PB*

RE: Review of Technical Deficiencies Identified under Division Order 97A. Hiawatha Coal Company. Hiawatha Complex, ACT/007/011-DO97A

SUMMARY:

Of the two soil issues remaining, one has been resolved. What remains is to clearly state that the top twelve inches of borrow material will be returned to the borrow site to aide in reclamation of the borrow site. This should be stated on pages 58 - 60 where borrow materials are discussed.

TECHNICAL ANALYSIS:

OPERATION PLAN

TOPSOIL AND SUBSOIL

Regulatory Reference: 30 CFR Sec. 817.22; R645-301-230.

Analysis:

The estimated volumes of stockpiled soils are presented in Table II-12 and discussed in the narrative under 231.400 (page 31). The volume of stockpiled topsoil available for use is listed as 2,588 CY.

Findings:

The information provided is accurate and informative.

RECLAMATION PLAN

TOPSOIL AND SUBSOIL

Regulatory Reference: 30 CFR Sec. 817.22; R645-301-240.

Analysis:

Reclamation of Borrow Areas is described on pages 41 and 43 of Chapter 2, and pages 58 - 60 of Chapter 3. In general, the sites will be graded (Exhibit V-13), ripped, disced, raked, seeded, fertilized and mulched. Pages 41 and 43 of Chapter 2 clearly indicates that the top 12 inches of soil from a from a borrow site will be returned to that site to expedite reclamation of the borrow area. This information should be repeated where borrow areas are again discussed within the text on pages 58-60, to ensure that this procedure is understood and that the DOGM inspector has the correct information at hand.

Findings:

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

R645-301-242, The MRP should clearly indicate that the top 12 inches of soil from a from a borrow site will be returned to that site to expedite reclamation of the borrow area. This information should be repeated in the MRP wherever the reclamation of substitute topsoil is addressed, i.e. pages 58-60.