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PAUL E. WATSON
GENERAL SUPERINTENDENT

JIM

January 29, 1982

FEB 03 1982

Mr. James W. Smith, Jr.
Coordinator of Mined Land Development
Division of Oil, Gas and Mining
4241 State Office Building
Salt Lake City, Utah 84114

RECEIVED

FEB 01 1982

Re: Sauerman Drag Scraper
Wellington Coal Cleaning Plant
ACT/007/012
Carbon County, Utah

**DIVISION OF
OIL, GAS & MINING**

Dear Mr. Smith:

The following is in response to Stipulation 12-1-81 referenced in your December 4, 1981 letter regarding the Sauerman Drag Scraper operation.

Exact depth and volume of topsoil to be stripped from each of the two soil types:

The two soil types within the proposed additional disturbed area are Shaley Colluvial Land (Sn) and Beebe Loamy Fine Sand (BeB). These soil types are described on pages 783-20, 21 and 783-23, 24 respectively in the Permanent Plan. Topsoil is only expected to be removed from the tail tower pad locations, and borrow areas should they become necessary to the operation. All potential tail tower and borrow area locations are within the Sn series. The upper Sn soil layer is a mixture of soil material, cobblestones, and weathered Mancos Shale fragments. There is no identified topsoil layer in the area. The Operator has, and will continue to remove the upper six inches of soil as required by UMC 817.22(c). There is currently some 200 cubic yards of soil stockpiled from tail tower and roadway excavations. Additional access roads that may be required will be Class III roads requiring no topsoil removal according to UMC 817.172(e). Class III roadways spanning the BeB soil series are the only potential disturbance in the series and topsoil is not expected to be removed. Soil removed from the Sn series is not expected to exceed 2000 cubic yards.

Mr. James W. Smith, Jr.

January 29, 1982

Page 2

Topsoil physical and chemical analyses:

The Operator will sample the accumulated topsoil and have it analyzed for pH, net acidity or alkalinity, phosphorus, potassium, and texture class. Results will be forwarded to the Division when received.

How contamination, compaction, and erosion of topsoil piles are minimized:

Generally, the soil in the area is alkaline and usually forms a crust which minimizes both wind and water erosion. Limited precipitation in the area precludes significant water erosion. Snow cover and/or frozen ground during the winter months also reduces erosion potential. Specifically, topsoil stockpiles are located close to, but not within potential tail tower locations. No stockpile is, or will be located in a drainageway. Side slopes of stockpiles are, and will continue to be gentle in order to minimize runoff velocity and subsequent soil carrying capacity. The tops of larger piles are flattened to further minimize runoff velocities. Trenches and berms are, and will continue to be excavated around the toe of the stockpiles not only to catch any sediment carried from the pile by runoff but also to divert runoff from undisturbed areas away from the stockpiles. Stockpiles are, and will continue to be seeded with the approved quick growing seed mix as soon after consolidation as is practicable to further minimize wind and water erosion.

How the proposed operations and new surface disturbances will be conducted to minimize erosion and additional contributions of sediment to local water courses:

Generally, the soil in the area is alkaline and usually forms a crust which minimizes both wind and water erosion. Limited precipitation in the area precludes significant water erosion. Snow cover and/or frozen ground during the winter months also reduces erosion potential. Specifically, site preparation for the tail tower currently involves, and is expected to continue to involve excavating a relatively flat area by either a minimal cut/fill or merely topsoil removal. Slopes are not significantly increased (in most cases slopes are decreased) or altered to result in additional erosion potential. Should additional access roads (Class III only) be required, ground cover in most cases will not be removed to minimize ditching in the roadway and dust loosened by vehicle tires.

Mr. James W. Smith, Jr.

January 29, 1982

Page 3

All runoff from a newly disturbed area flows into the Upper Refuse Pond. Since this pond, along with the Lower Refuse Pond and Clear Water Pond are a closed circuit water source for the Coal Cleaning Plant, no water is discharged from the permit area. Subsequently, there is no potential sediment contributions from newly disturbed areas to local water courses.

Topsoil stockpile seed mix:

The following seed mixture for topsoil stockpiles at the Cleaning Plant was approved by the Division on December 1, 1981:

<u>Seed Name</u>	<u>Pounds PLS/Acre</u>
Crested Wheatgrass	2.0
Tall Wheatgrass	3.0
Yellow Sweet Clover	1.5

This seed mixture has been planted on each of the existing topsoil piles.

Permanent reclamation seed mix:

The Operator does not intend to change the permanent reclamation plan by this proposal. The following seed mix is intended for permanent reclamation and is identical to that mix submitted on page 784-15, 16 of the Permanent Plan:

<u>Type and Seed Name</u>	<u>Pounds PLS/Acre</u>
Grasses	
Galleta Grass	1.0
Indian Ricegrass	1.0
Forbs	
Desert Trumpet	2.0
Desert Plantain	1.0
Shrubs	
Mat Saltbrush	4.0
Shad Scale	<u>4.0</u>
TOTAL:	13.0

Mr. James W. Smith, Jr.

January 29, 1982

Page 4

Vegetative types encountered in the disturbed areas:

Vegetative types in the disturbed area are shown on Drawing No. E9-3345 and are described on page E-5 of Appendix E in the Permanent Plan. Dominant species are Shad Scale and Galleta Grass. Other common species include Blue Gramma, Indian Ricegrass, and Cryptantha. Ground cover is only about seven percent.

Methods of measuring success of revegetation:

The potential disturbed area is a long narrow strip. Success of revegetation will be measured by comparing the newly reclaimed area with the adjacent undisturbed area.

This response to Stipulation 12-1-81 is submitted as a supplement to my October 26, 1981 letter and to the Operation and Reclamation Plan, Western District - Coal, Wellington Coal Cleaning Plant, submitted March 20, 1981.

Sincerely,

Paul E. Watson

Paul E. Watson

cc: F. Boinsky
B. L. Kirkwood
V. R. Watts
Environmental Contact File