



State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

Norman H. Bangarter
Governor

Dee C. Hansen
Executive Director

Dianne R. Nielson, Ph.D.
Division Director

355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203
801-538-5340

August 30, 1989

TO: Susan Linner, Permit Supervisor

FROM: Lynn Kunzler, Reclamation Biologist *Lyn K.*

RE: Review of IBC & New Coal Handling Facilities, Genwal Coal Company, Wellington Preparation Plant, ACT/007/012-89A, Folder #3 Carbon County, Utah

SUMMARY:

The referenced plan has been reviewed for compliance with pertinent biology, landuse, and soils regulations. This plan cannot be approved at this time due to major deficiencies in addressing soils and landuse regulations as discussed below.

ANALYSIS:

UMC 786.19(b) Reclamation Feasibility - LK

This proposal will affect a portion of the "surface facilities" revegetation test plot. Genwal has conducted monitoring of this plot during the 1989 field season according to Division guidelines. However, data (report) has not yet been submitted. As per agreements made, Genwal must commit to additional revegetation testing. A plan and schedule for designing and implementing additional study plots must be submitted and approved prior to any disturbance of the surface facilities test plot.

UMC 817.21 to 817.25 Topsoil - LK

The operator has not addressed soil issues in the amendment. Information in the approved ORP (Appendix K) indicate that soils in the area may be suitable for reclamation. Commitments are also made (in ORP) to conduct soil testing prior to any new disturbance and to remove and store all suitable materials. Soil surveys indicate that as much as four feet of material may be suitable.

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ACT/007/012-89A

The operator must conduct adequate soil sampling to determine the suitability of soils and prepare a soil handling plan based on the samples taken. Show on map the sample locations. Suitable and unsuitable materials should be segregated. The operator must identify the volume of soils to be salvaged and identify the location for storage of these materials and how the stockpiled materials will be protected from erosion and other impacts, including cross sections of proposed stockpiles (i.e. min./max. height, volumes, slopes, etc.).

At each sample location, it is recommended 1-foot that soil samples be taken at 0"-6", 0"-12" and continuing at intervals to a maximum 4' depth, or depth of planned excavation, whichever is greater. At a minimum, all parameters listed on table one of the Division's Soils Handling Guidelines are to be analyzed.

RECOMMENDATIONS:

Until the issues identified herein are resolved, the IBC and new facilities cannot be approved.

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cc: B. Team
H. Sauer
BT3013/56-57