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SWISHER COAL CO.

P. O. BOX AU

PRICE, UTAH 84501

PHONE 801-637-5050

*File Copy - Swisher
#2*

February 8, 1980

Mr. Don Crane, Director
Office of Surface Mining
Region V
1020 15th Street
Brooks Towers
Denver, Colorado 80202

Re: Swisher Coal Co.
Gordon Creek #2 Mine
Lease Modification
Mining & Reclamation Plan

Dear Mr. Crane:

In reference to your letter of January 28 to Mr. Ron Daniels, I am herewith submitting additional data to complete the Mining and Reclamation Plan for the Gordon Creek #2 Mine Lease Modification.

- 1) Backfilling and Regrading - As explained in Exhibit #2, "Backfilling and Regrading Plan", paragraph 2...restoration to approximate original contour is highly impractical. However, it is the intent of Swisher Coal Co. to restore the area to a form acceptable to the landowner using such materials that are available at the site.

There exists no plan to bring in any material to achieve approximate original contour for the portal area.

- 2) Ground Water Monitoring - Reference to Exhibit #5 and #7 (revised) will show that Swisher has committed to monitor quantity and quality of all known springs in and adjacent to the permit area. In addition, Swisher Coal Co. will hereby commit to monitor quantity and quality of all known springs in and adjacent to the permit area.
- 3) Hydrologic Impact of Roads - The enclosed copy of Exhibit #8 (revised February 8, 1980) will fulfill the requirements of this section.
- 4) Water Rights - Exhibit #7 (revised January 17, 1980) has addressed

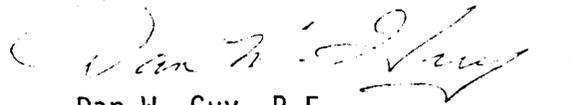
Mr. Don Crane
February 8, 1980
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the question of water rights and replacement.

- 5) Topsoil Handling - The enclosed copy of Exhibit #10 (revised February 8, 1980) will further address the question of topsoil handling.
- 6) Seeding - Revegetation is also further addressed in the enclosed Exhibit #10 (revised February 8, 1980).

It is our hope that this additional information will fulfill the requirements for a timely approval of this mining plan. The lease modification has been approved and is currently undergoing a thirty (30)-day (or less) review period by the Justice Department. We have mined to the lease barrier boundary and are ready to cross into it upon your approval.

Respectfully,



Dan W. Guy, P.E.
Chief Engineer

DWG/rh

Enclosures

cc: Ron Daniels, Utah Division of Oil, Gas & Mining



United States Department of the Interior

OFFICE OF SURFACE MINING

Reclamation and Enforcement

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DENVER, COLORADO 80202

OFFICE OF THE REGIONAL DIRECTOR

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DIVISION OF
OIL, GAS & MINING

Mr. Ron Daniels
Coordinator of Mined Land Development
Department of Natural Resources
Division of Oil, Gas and Mining
1588 West North Temple
Salt Lake City, Utah 84116

Dear Ron:

This office has reviewed the mining and reclamation plan for the lease modification area of Swisher Coal Company's Gordon Creek No. 2 Mine. These plans were sent from Mr. Dan Guy of Swisher Coal Company to OSM on December 27, 1979. Due to the short time frame that Swisher Coal has requested, this letter addresses both those items which are lacking from the mining and reclamation plan as well as those items which are technically inadequate.

First, I should note that proposed mining in the 70 acre lease modification will make use of the present portal facilities. Therefore, the plan must show that those facilities conform with 30 CFR 211 (as these regulations incorporate the Interim Regulatory Program).

Based on our review, the following questions and concerns need to be addressed in the mining and reclamation plan:

- (1) Backfilling and regrading. Does any plan exist for bringing in material to achieve approximate original contour for the portal area?
- (2) Ground water monitoring. Swisher Coal Company should commit to monitoring the quality and quantity of springs in and adjacent to the permit area.
- (3) Hydrologic impacts of roads. Detailed information is needed as to the location of all culverts and ditches related to access and haul roads. The plan should demonstrate that all ditches and culverts are capable of passing the peak runoff resulting from a 10-year, 24-hour precipitation event. Cross-section and gradient profiles should be submitted for all access and haul roads. Gradient profiles for haul roads should include road segments to the point where the haul roads reach public roads.
- (4) Water rights. More information is needed as to the owner, use, location and description of water rights in the mine area. Swisher Coal Company should commit to a plan for replacement of water supplies should it become necessary.

Mr. Ron Daniels

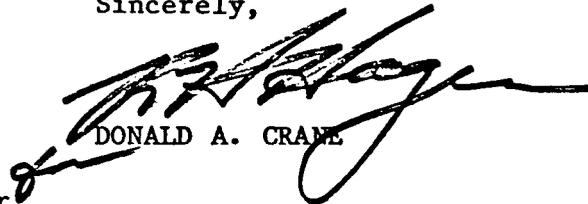
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(5) Topsoil handling. Swisher Coal Company should commit to obtaining topsoil or a substitute growing medium to replace the topsoil in the portal area. Information as to the volume needed, depth of soil placement, and probable source is needed. Chemical analysis for the replacement material should include SAR, Mg, Na, Ca, pH, and electrical conductivity.

(6) Seeding. The seeding mixture submitted by Swisher Coal Company contains all introduced species. Disturbed lands must be seeded or planted with species of the same seasonal variety native to the area. A revised seed mixture, formulated in consultation with OSM, BLM, and Utah Division of Oil, Gas and Mining should replace the seed mixture identified in the mine and reclamation plan.

A copy of this letter is enclosed for transmittal to the applicant by your office. If you have any questions regarding this review, please contact John Nadolski (303-837-3773) of my staff.

Sincerely,



DONALD A. CRANE

cc: Feldmiller, USGS, Denver
Moffitt, USGS, Salt Lake City
Wicks, BLM, Salt Lake City

Exhibit #8: Hydrologic Impact of Roads
(Revised 02-08-80)

Exhibit #8
Hydrologic Impact of Roads

1. General - Access and haul roads, culverts, ditches, and road right-of-way are constructed, and shall be maintained and reclaimed, to the extent practicable, to prevent additional contributions of suspended solids to streamflow or runoff.
2. Construction - All roads in the mine area are constructed. All grades are less than ten percent (10%) and there are no stream crossings.

All roads are adequately drained and all water control structures are designed with a discharge capacity capable of passing the peak runoff from a ten-year, 24-hour precipitation event. Culvert locations are shown on the attached map, along with typical sections of roads, pads, and ditches. The culverts across the haul road are 24" as shown - the ability of this size culvert to handle the peak runoff has been demonstrated in the calculations in Exhibit #6. The ditch along the road has a depth of 18" - any overflow from the sedimentation ponds would be 834 gpm (as per Ex. #6); this flow would reach a depth of less than 11 inches in a "V" notch wier, indicating the road ditch will be more than adequate to support the 10 year - 24 hour event runoff. Access and haul roads are surfaced with a durable gravel material. Toxic or acid-forming substances are not used.

3. Maintenance - Access and haul roads are routinely maintained by wetting, scraping, and resurfacing as necessary. Ditches and other drainage controls are also routinely maintained to provide adequate control along the roads.
4. Other Transport Facilities - There are no railroads in the mine area. Conveyors are constructed and maintained to prevent additional contributions of suspended solids to streamflow.

DG/ac

Exhibit #10: Topsoil Handling and Revegetation
(Revised February 8, 1980)

Exhibit #10
Topsoil Handling and Revegetation

1. Topsoil Handling - The #2 Mine area is a pre-existing structure and the majority of the surface disturbance associated with the mine has already been done. At the time of the original construction, no topsoil was saved, and as a result, little, if any, can be salvaged at this time. In any future disturbance the topsoil will be removed and stockpiled as shown on the attached map. The topsoil will be compacted as placed, protected from surface runoff, and seeded to establish a protection from wind and water erosion.

Swisher Coal Company intends to demonstrate that the existing "soil" in the #2 Mine area will be adequate for promoting revegetation upon final reclamation. We will work with the Utah Division of Oil, Gas, and Mining and such other agencies as necessary to accomplish this goal. Suggested methods of demonstrating the soil capabilities include, but are not limited to, test plots, soil treatment, and fertility tests. The unavailability of topsoil in this region makes it virtually impossible to commit to shipping in soil. It is estimated that a six-inch topsoil depth would require some 6500 cubic yards of material. Swisher Coal Company will hereby commit to working with Oil, Gas, and Mining and others, as necessary, to provide for a reasonable alternative growing medium...importing of topsoil can only be considered as a last resort, and will not be used if an alternative method can be demonstrated to provide an acceptable medium.

2. The soil is a loam to silty loam depending on depth of development. Soil depths range from six inches on ridge tops to six feet in canyon bottoms, and are generally better developed on north-facing slopes.

North-facing slopes in the area have a cover of Douglas Fir and Aspen, along with some Ponderosa Pine, Juniper, and Pinyon Pine. Canyon bottoms, south-facing slopes, and ridgelines are generally covered with brush, such as Oak Brush, Mountain Mahogany, and Service Berry, and grasses such as Western Wheat Grass, Wild Rye, and Lupine. The mine site is in the canyon bottom and south-facing slope. It is proposed to revegetate the disturbed areas with the following seed mixture upon reclamation:

3 lb./acre - Smooth Brome
3 lb./acre - Timothy Grass
2 lb./acre - Orchard Grass
2 lb./acre - Crested Wheat Grass
1 lb./acre - Kentucky Blue Grass
1 lb./acre - Ranger Alfalfa
1 lb./acre - Meadow Foxtail
<hr/> 13 lb./acre - Total

Disturbed areas no longer needed, such as road cuts, highwalls,

etc., shall be revegetated with the above seed mixture in the late fall or early spring following the disturbance. The above seed mixture is proposed only as a temporary revegetation measure. A permanent revegetation mixture will be formulated for final reclamation. Swisher Coal Company will work with Oil, Gas, and Mining and others as necessary to establish an acceptable permanent seed mixture for final reclamation, using native varieties as possible.

