



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)

June 10, 1993

TO: Pamela Grubaugh-Littig, Permit Supervisor

FROM: Henry Sauer, Senior Reclamation Soils Specialist 

RE: Issues Identified, Resubmittal of Reclamation Plan, Mountain Coal Company, Gordon Creek #2, #7, and #8 Mines, ACT/007/016, Folder #2, Carbon County, Utah

SYNOPSIS

The resubmitted reclamation plan for the Gordon Creek #2, #7, and #8 Mine has been received (May 10, 1993) and reviewed for technical adequacy. The plan remains inconsistent and difficult to interpret. Editorial changes and substantive commitments must be made prior to approval of the reclamation plan.

The forthcoming analysis cannot be construed as a thorough review because of the lack of completeness and the numerous inconsistencies.

ANALYSIS

The permittee has not addressed issues raised in my March 17, 1993 memo regarding demonstration of topsoil suitability for the No.2 Mine. In the permittee's May 10, 1993 response Mr. Dan Guy directs the reader to specific portions of the submittal which addresses the Division's deficiencies. The portion of the submittal which was supposed to address the demonstration of substitute topsoil suitability for the No.2 Mine (i.e. p. 8-28.1) has been omitted.

On pages 3-17 and 3-34 the permittee discusses the burial of concrete foundation. The permittee states that concrete slabs will be left in place and cover with a minimum of two feet. This soil cover depth is not adequate to sustain a permanent vegetative cover. The permittee must commit to covering all concrete slabs with four feet of suitable topsoil material.



Page 2
May 10, 1993 Resubmittal Review
ACT/007/016 Reclamation
June 10, 1993

On page 3-36, paragraph-d, the permittee states that the sedimentation pond will remain in place after final bond release. This comment and others like it are contrary to the reclamation plans, maps and cross-sections provided within the submittal. Please make the necessary text changes to establish consistency.

On page 3-37 the permittee states that "All exposed coal outcrops resulting from this operation will be covered with a minimum of four feet of incombustible material...". According to the most recent backfilling and grading plans and cut/fill cross-sections for the mine access road and the No.2 Mine, coal seams will not be covered during reclamation operations.

On page 3-38a and p 3-46 the permittee discusses the potential for revegetation work on the downslope of the fan portal pad. Will this revegetation work be accomplished during Phase I reclamation activities? What revegetation work will be done?

On page 3-44 the permittee references section 3.5.7.1 as it pertains to topsoil redistribution. This section of the plan discusses impoundments. Please make necessary changes.

On pages 3-48 and 3-48a the permittee proposes a soil sampling scheme for the No.7 & 8 Mine. The permittee proposes sampling soil in areas which receive stockpiled topsoil and subsoil and in areas which will not be backfilled. The permittee then goes on to say that unsuitable material will be removed and covered with four feet of suitable material or covered in place with two feet of suitable material. The permittee must commit to covering (covered in place) all unsuitable material identified by the aforementioned sampling scheme with four feet of suitable material. In addition, the operator must provide a specific time schedule for sampling topsoil material so that laboratory results are received in enough time to determine fertilizer recommendations and the suitability of the material in question. Formulation of fertilizer recommendations based on laboratory results and the covering and/or removal of unsuitable material based on laboratory results must be accomplished prior to seeding activities.

On page 3-54 the permittee includes, within the revegetation schedule table, the statement "incorporate wood fiber & straw to soil". The text does not discuss incorporation of wood fiber mulch and essentially dismisses the use of straw mulch. Please make necessary changes to reflect the reclamation plan.