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Norman H. Bangerter
Governor
Dee C. Hansen
Executive Director
Dianne R. Nielson, Ph.D.
Division Director

State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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

March 10, 1993

TO: Pamela Grubaugh-Littig, Permit Supervisor

FROM: Susan M. White, Senior Reclamation Biologist *SMW*

RE: Technical Deficiency, Mountain Coal Company, Gordon Creek #2, #7 & #8 Mines, ACT/007/016, Folder #2, Carbon County, Utah

Synopsis

The reclamation plan received by the Division on February 1, 1993 was reviewed for technical adequacy. The reclamation plan was found to be deficient as described below.

Analysis

Deficiencies are as follow:

General Contents

R645-301-142. The operator must distinguish on the reclamation map, plate 3-7, those areas in which the operations occurred prior to August 3, 1977.

Biology

R645-301-341. The permit continues to discuss the use of shrub seedling stock but fails to give details as to planting and species. Please detail.

R645-301-341.220. Numerous cut slopes are proposed to be left. These slopes are required to be seeded and meet the vegetation success standards. Please detail the seedbed preparation method, seed mixtures and success standards if different than as stated in the plan.

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R645-301-341. Please commit to installing the erosion control mat as per the manufactures specifications.

R645-301-355. Please commit to using erosion control matting on slopes 2:1 or steeper not steeper than 2:1.

R645-301-342.100. Several seeps, springs, and drainages will occur within the reclaimed area. The permit does not describe any revegetation enhancement measures for these sites. Plant species with high moisture requirements should be planted along these corridors. Large containerized plants of species such as Salix, Elderberry, Serviceberry and Chokecherry besides providing rapid growth for wildlife cover will also help stabilize the channels in these areas. Please detail a revegetation plan specific for these areas as described above.

R645-301-342.200. "Hobble Creek" big sagebrush is a newly released sagebrush that is very robust and palatable. Sagebrush has been documented to vary widely in it nutritive content and palatability to wildlife. If the permittee does not wish to use "Hobble Creek" big sagebrush, please propose another genotype with related data as to its proven nutritional value for wildlife.

R645-301-353.240. The permittee states that all coarse fragments greater than 18 inches will be removed. Coarse fragments on the reclaimed site will aid in providing niches to increase diversity in plant and animal species. Please delete the comment regarding removal of rocks in topsoil.

R645-301-354. All seeding will be done after September 1, please remove the statement "except in those areas where earthmoving activities preclude access."

R645-301-356.100. The proposed success standards are very confusing. Please review the entire permit including tables and maps for clarity and consistency. The reference areas for the No. 7 and No. 8 mines are base line data from the disturbed sites. Additionally, no standards have been proposed for the fan portal area, near the gate which was reclaimed in the early 1980's. Please correct.

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R645-301-356.110. The Oak Shrubland Reference Area of the #2 mine was sampled prior to the Division's current Vegetation Information Guidelines. Based on the previous studies of that area, the vegetative cover was 48 percent. The Division requires the permittee to sample the site in July 1993. Based on these studies, this reference area maybe used as the vegetative standard.

R645-301-356.230. The permittee continues to use production as a success criteria. Please explain this as it relates to the postmining land use.

R645-301-357.300. The permit contains the section 3.5.5.4 Reclamation Management. The permittee should be reminded that as yet Utah's coal program has no allowances for maintenance once the bond period has begun. Maintenance practices, as described in this section, will restart the bond period of extended liability. The permittee is encouraged to use good techniques and materials in order to avoid maintenance.

Land Use

R645-301-413.220. The permittee continues to describe the postmining land use throughout the permit as wildlife habitat. Yet stock watering ponds and sediment ponds are to be left. Please clarify.

Bonding and Insurance

R645-301-880.320. Where a silt dam is to be retained as a permanent impoundment, bond may not be released until provisions for sound future maintenance by the operator or the landowner have been made with the Division. Permanent Pond 2/7/8 may not be allowed to fill in. Please provide the necessary maintenance documents.

Recommendation

The deficiencies must be corrected prior to permit approval.

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