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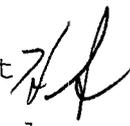
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June 16, 1994

TO: Darron Haddock, Permit Supervisor

FROM: Henry Sauer, Senior Reclamation Soils Specialist 

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

**SYNOPSIS**

The most recent reclamation plan proposal has been received (August 6, 1994) by the Division. The proposal has been reviewed for technical adequacy and reclamation feasibility.

The issues enumerated below must be adequately addressed prior to approval of the proposed reclamation plan.

**ANALYSIS**

**R645-301-233.100 - Topsoil Substitute and Supplements**

The permittee has committed to implement a soil/spoil sampling program for **the entire disturbed area** immediately after soil/spoil placement (page 3-48 and 3-48a). The plan is designed to identify any areas which are occupied with unsuitable plant growth medium.

The sampling program for Sample Site # 3 (page 8-28.1) must be implemented immediately and results received prior to the commencement of backfilling and grading activities. The soil sampling proposal for areas with slopes greater than or equal to 70% (page 3-19 and 3-48a), where topsoil will not be redistributed, must be implemented and results received prior to commencement of any backfilling and grading activities. The results from the soil/spoil sampling programs described above will be used to determine fertilizer application types and rates (page 8-32 and 8-32a). All sample site locations must be identified on the post mining topography map.

The permittee must be fully aware that based on the initial results from the sampling programs mentioned above additional soil/spoil sampling may be require to determine the



extent of unsuitable material if said material is encountered.

Given the timing of the soil/spoil sampling program the implications of locating poor quality material at or near the surface are immense. If said material is encountered the treatment of these areas will require four feet of suitable cover material (Page 3-48a). The acquisition and characterization of suitable material subsequent to backfilling and grading activities may be extremely difficult. Given these factors this writer must emphasize the importance of fulfilling the material handling commitments described on page 3-17 regarding the removal and select handling of contaminated backfill material (i.e. oil and grease, coal, etc.). These same identification and handling procedures must be employed when shale and/or coal is encountered during backfilling and grading.

#### **R645-301-240. Reclamation Plan**

As mentioned in previous reviews (June 10, 1993) all concrete slabs must be buried with at least four feet of suitable cover material. In addition, commitments to dispose of waste material in an approved land fill remain. The permittee has not revised the plan to date regarding these issues and must do so prior to approval of the proposed reclamation plan.

#### **RECOMMENDATION**

The permittee must adequately address the aforementioned issues prior to approval of the proposed reclamation plan.

CC: Jesse Kelley  
Tom Munson  
Susan White