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State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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May 13, 1997

Paige B. Beville, Manager, Environmental Health & Safety
Mountain Coal Company
ARCO Coal Company
555 17th Street, Room 2170
Denver, Colorado 80202

Re: Seeding Time Change, Mountain Coal Company, Gordon Creek #2, #7, & #8 Mines, ACT/007/016-97A, Folder #2, Carbon County, Utah

Dear Ms. Beville:

A review of the referenced amendment received April 7, 1997 by Susan White Biologist for the Division so notes the following deficiencies:

R645-301-354, disturbed area planted at any time other than fall will meet the below listed success standard within two years of seeding.

1. Approved sampling methods and adequate sample size will meet the requirements of the Division's Vegetation Information Guidelines, Appendix A.

2. The perennial vegetative cover of the reseeded area will be greater than 70 per cent of the reference area cover (no statistics).

3. Woody plant density of the reseeded area will be greater than 80 per cent of the standard described in the permit (no statistics).

4. The vegetative cover will meet the diversity standard described in the permit.

The Operator must commit to meeting all the above listed standards. If any one of the standards are not met than the area must be reseeded.

R645-301-341, accepted methods for broadcast seeding require raking or other type of method to ensure soil/seed contact.

Please provide a commitment referencing these four items in your Mining and Reclamation Plan by no later than May 28, 1997. If you have any questions please call Susan White or myself.

Sincerely,

Joseph C. Helfrich
Permit Supervisor

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cc: Dan Guy
Dave Darby
Susan White
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