

0010



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

Michael O. Leavitt
Governor
Kathleen Clarke
Executive Director
Lowell P. Braxton
Division Director

1594 West North Temple, Suite 1210
PO Box 145801
Salt Lake City, Utah 84114-5801
801-538-5340
801-359-3940 (Fax)
801-538-7223 (TDD)

RRZ

OK

May 15, 2002

TO: Internal File

THRU: Dave W. Darby, Senior Reclamation Specialist/Team Lead

FROM: Joseph C. Helfrich, Senior Reclamation Specialist

RE: Rock Gabion Structures, Mountain Coal Company, Gordon Creek #2, #7, & #8 Mines, C/007/016-AM02A

SUMMARY:

On March 13, 2002 the Division received an amendment to remove several rock gabions located along the county road below the reclamation of the Gordon Creek No. 2/7/8 mines. The Gabions were originally installed to contain sediment from the reclaimed Fan Portal area until vegetation was well enough established to control runoff and sediment. Appendix 9-3 contains the data, analyses, and conclusions to support the proposed removal of the gabion structures. This technical memo is a review of Mountain Coal Company's proposal to remove the gabions.

TECHNICAL ANALYSIS:

OPERATION PLAN

VEGETATION

Regulatory Reference: R645-301-330, -301-331, -301-332.

Minimum Regulatory Requirements:

Each application will contain a plan for protection of vegetation, fish, and wildlife resources throughout the life of the mine. The plan will provide a description of the measures taken to disturb the smallest practicable area at any one time and through prompt establishment and maintenance of vegetation for interim stabilization of disturbed areas to minimize surface erosion. This may include part or all of the plan for final revegetation as described in reclamation plan for revegetation.

For UNDERGROUND COAL MINING AND RECLAMATION ACTIVITIES a description of the anticipated impacts of subsidence on renewable resource lands and how such impact will be mitigated needs to be presented.

TECHNICAL MEMO

A description of how, to the extent possible, using the best technology currently available, the operator will minimize disturbances and adverse impacts. This description will include protective measures that will be used during the active mining phase of operation. Such measures may include the establishment of buffer zones, the selective location and special design of haul roads and powerlines, the monitoring of surface water quality and quantity, and through prompt establishment and maintenance of vegetation for interim stabilization of disturbed areas to minimize surface erosion.

Analysis:

The report prepared by Mt. Nebo Scientific Inc. provides an evaluation of the vegetation success of the reclaimed fan portal area. During reclamation most of the seeding occurred in October 1998. This included slopes along the roadsides leading to the reclaimed areas. According to the report quantitative sampling on the seeded slopes was conducted to monitor the success of the vegetation. As a comparison of background erosional conditions vegetation in the reference area was also sampled. Total living cover for the two areas are as follows: 52.75% for the sediment control area and 40.83 % for the reference area. The sediment control area obviously had a significantly greater percentage of total living cover when compared to the Reference Area as suggested in the report. The results of the vegetation monitoring suggest that alternative sediment controls such as silt fences and gabion structures may no longer be necessary. This reviewer concurs with the conclusions provided in the report and supports the applicant's request to remove the gabion structures.

Findings:

Information provided in the application is adequate to meet the requirements of this section of the regulations.

RECOMMENDATION:

The application is recommended for approval.