



# State of Utah

DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF OIL, GAS AND MINING

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September 11, 1991

TO: Pamela Grubaugh-Littig, Permit Supervisor

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

RE: Deficiencies for Permit Renewal, Beaver Creek Coal Company, Gordon Creek #3 & #6 Mines, ACT/007/017, Folder #2, Carbon County, Utah

## Synopsis and Analysis

The Gordon Creek #3 & #6 permit was reviewed for deficiencies pertaining to reclamation and bond release. The following deficiencies were noted.

### R614-301-100 GENERAL CONTENTS (SW)

112.310 Please update the names and addresses of the directors and officers of Beaver Creek Coal Company (BCCC) in the permit.

113.30 Please update the list of violations in the permit.

117.100 Please provide a current copy of the certificate of liability insurance for insertion in the permit.

117.200 Please provide proof of publication for the current permit renewal in the permit.

### R614-301-300 BIOLOGY (SW)

356. Revegetation: Standards for Success.

The reclamation success standards for final bond release are unclear in the permit. Please clarify the following:

1) The postmining land use, on page 4-32 of the permit, is designated as livestock grazing, deer forage, hunting, etc. The revegetation success standards for the postmining land use of livestock grazing are based on vegetative cover and production as compared to the reference area. The revegetation success standard for the postmining land use of wildlife habitat is determined on the basis of tree and shrub stocking and vegetative cover.

The Gordon Creek #3 & #6 permit states that reclamation success will be based on cover and production. Based on the postmining land use, tree and shrub stocking rates must also be a success standard.

If tree and shrub stocking rates are used as a success standard, then shrub density measurements must be taken in the reference areas and on the site. Specific commitments must also be stated in the permit as to stocking rates.

2) Two reference areas, sagebrush-grass and oak shrubland are used as the success standard. Map 9-1 is not of sufficient scale to determine which reclaimed areas are to be compared to the grass or the oak reference area. Additionally, the vegetation types on the road from the gate to the facilities area are not shown on the map. Please either detail in writing the success standards for each reclaimed area or provide a map with those designations.

3) The success standards for cover, production and shrub density must be met for two consecutive years at a 90 percent statistical confidence interval.

#### R614-301-400 LAND USE (SW)

412.200 The permit contains a letter from Calvin Jacobs concerning the postmining land use. According to Table 4-1 and Figure 4-1, the reclaimed area is also located on land owned by the State of Utah and joint ownership between Calvin Jacobs and Utah Power and Light. If the Table and Figure are accurate, then statements must also be obtained from the aforementioned land owners.

#### R614-301-500 ENGINEERING (SW)

521.141 Plate 3-1A, Post Mining Topography, must designate the disturbed area boundaries.

#### Recommendation

The permit can be considered complete; however, the operator must address the deficiency issues prior to permit renewal.

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