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State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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

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

June 26, 1992

Mr. Rick Olsen, President
Soldier Creek Coal Company
P. O. Box I
Price, Utah 84501

Dear Mr. Olsen:

Re: #3 Fan Site As-Built, Soldier Creek Coal Company, Soldier Canyon Mine,
ACT/007/018-92A, Folder #3, Carbon County, Utah

The Division has completed the review of SCCC's as-built designs of the #3 fan site. Although most of the concerns have been addressed at this time, there still appears to be a few outstanding issues that need to be addressed. Please review the attached technical memos which discuss the problems. Please note that there also appears to be an error on page 7-103 of your submittal where it states that the drainage area for ASCA 7 is 1.49 acres. Exhibit 5.21-2 indicates that the area of the topsoil storage site is 2.3 acres.

You should address the deficiencies outlined by no later than July 29, 1992. If you have any questions please call me or the appropriate member of my staff.

Sincerely,

A handwritten signature in black ink that reads "Daron R. Haddock".

Daron R. Haddock
Permit Supervisor

Enclosures

cc: S. Falvey
P. Baker
W. Western
FAN3DEFI.SOL



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June 5, 1992

TO: Daron Haddock, Permit Supervisor

FROM: Sharon Falvey, Reclamation Specialist SKF

RE: #3 Fan Site Deficiency Response, Soldier Creek Coal Company, Soldier Canyon Mine, ACT/007/018, Folder #2, Carbon County, Utah.

Summary and Recommendation

The applicant has responded to Rick Summers deficiency list per the Memo dated June 1, 1992. The operator has included much of the information on the certified design maps. This information must be provided in the text portion of the MRP, and may be submitted following construction.

Some minor deficiencies exist that may be submitted following commencement of the reclamation. However, the following must be completed prior to approval, and incorporated into the design.

- 2.a. A commitment for final reclamation in the fall of 1993 if the complete fan site amendment is not submitted must be provided for direct insertion to the text of the plan prior to approval.
- 3.a. Provide mapping and a commitment for silt fencing along the toe of the fill slope of the exploration road.

Analysis

The analysis is identified by the number corresponding to Rick Summers referenced memo.

1. The operator has included test hole B-1 to remain open for water monitoring. The hole was completed with 1-1/2" PVC pipe randomly slotted to a depth of 45 ft. A formal watering plan is not proposed.
The purpose of the open bore hole is for determination of stability for the fan site. Because the operator proposes no formal watering plan the operator will be required to commit to proper closure of the bore hole in 1993 if the site is not going to be installed.

Deficiency:

1. a. Commit to proper closure of the bore hole by 1993 in

text of the amendment if the fan site ^{is} amendment is not received and approved by fall of 1993.

2. The operator has proposed an interim revegetation and stabilization plan. The commitment made in the January 20, 1992 cover letter from SC3 to the Division for full reclamation in the fall of 1993 if the complete fan site amendment is not submitted must be provided for direct insertion to the text of the plan prior to approval.

Deficiency

2. a. Commit to final reclamation in the fall of 1993 if the complete fan site amendment is not submitted to the Division by that time. Provide commitment insertable to the text of the document.
3. Hydrologic designs were submitted for the 10 year - 6 hour design event for drainage to and over the exploration road. The ditch along the road is described by the in-slope and cut of the road. Using the operators information this results in a design depth of flow of 0.81 ft. The top width of this flow would be 0.85 ft. This information should be included as part of the ditch design. Additionally the operator has not sized the berm along the outslope of the road.

Designs were submitted for a small sediment basin. The basin is sized to handle 324 ft', the runoff from a 10 year-24 hour event is 0.20 acre feet or 871 ft'. The operator indicates the sediment basin design as detailed by Edward A. Hansen, will remove 100% of particles 0.125 mm or larger. The outlet of the basin will be treated with a silt fence. The operator must provide this design in the text of the amendment.

The operator has identified that straw bails and silt fences will be located along the exploration road outslope through the first growing season. No designs or locations are identified for siltation structures except alongside the road in-slope.

- a. Provide mapping and a commitment for silt fencing along the toe of the fill slope of the exploration road.
- b. Provide a detail of a typical silt fence installation: map their locations. Include the referenced design calculations for the sediment trap by Edward A. Hansen.
- c. Provide the as-built height of the berm on maps, include design depth of flow and velocity for road ditch. Provide the design information from maps, and place in the text of the amendment.
- d. Provide direction of flow for the pad area.

cc: Rick Summers



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TO: Daron Haddock, Permit Supervisor

FROM: Paul Baker, Reclamation Biologist *PAB*

DATE: April 15, 1992

RE: #3 Fan Site Reclamation Plan, Soldier Creek Coal Company, Soldier Canyon Mine, ACT/007/018, Folder #2, Carbon County, Utah

SUMMARY

Soldier Creek has submitted plans for the interim reclamation of the #3 fan site which is not being developed at this time. The revegetation plan presented is a change from the approved methodology and would require some modification to make it acceptable.

The approved fan site exploration amendment calls for reclamation of the site as soon as practicable but in no case later than April 30. The prudence of seeding at this time of year is questionable, but normal or better precipitation may allow revegetation efforts to be successful.

ANALYSIS

R645-301-331

Interim Revegetation

Proposal:

The entire road surface area and cut slopes would be pock marked to facilitate moisture retention. The area is to be hydroseeded with the interim seed mixture combined with 500 lbs. per acre of wood fiber mulch, 60 lbs. per acre of tackifier, and 100 lbs. per acre of 16-16-8 fertilizer. All areas would then be oversprayed with 1500 lbs. per acre of wood fiber mulch combined with 60 lbs. per acre of tackifier. Seed would need to be hand broadcast in some areas, and these sites would be mulched with 2000 lbs. per acre of wood fiber mulch.

Analysis:

The plan presented is a change from the interim revegetation plan contained in the existing MRP. The existing plan is preferred. It consists of broadcasting fertilizer by hand, raking the area, broadcasting seed by hand, raking it to cover the seed, and mulching with straw or hay at the rate of 2 tons per acre. Mulch would be anchored by crimping it with shovels or with tacked plastic netting.

If the Operator desires a change in interim revegetation methodology for this site, some changes to the plan presented must be made. Literature reports state that mixing seed with fertilizer and/or hydromulch reduces the chances for success. Particularly, mixing seed and fertilizer in the slurry has been shown to reduce seed viability up to 50%. Mulch applied with seed is not quite as detrimental and can even be beneficial compared to not including mulch if a centrifugal pump is used. However, under most conditions, the mulch tends to reduce seed contact with the soil.

The existing plan should be followed for fertilizer application. To increase seed/soil contact, seed should be applied with no additives except, perhaps, a tackifier. After seeding, the area should be raked in a way that will not damage the gouges or pock marks. Finally, hydromulch should be applied.

The fan site exploration amendment as approved calls for reclamation of the site as soon as practicable but in no case later than April 30. The performance standards say that planting is to be done during the first normal period based on local conditions. Climatological information presented in Soldier Creek's plan and in other plans indicates that with normal precipitation in May and June, adequate soil moisture may be available for seed germination and seedling establishment. Establishment potential will be enhanced by raking seed after broadcasting and by the surface roughening procedures proposed. It is felt that Soldier Creek needs to adhere to the commitment to reclaim the area even though it would have been better to seed in late February when the Division first issued a denial of the delay until 1993 in reclaiming the site.

Deficiencies:

The approved plan for interim revegetation is recommended. If Soldier Creek desires to change this methodology, the following deficiencies need to be addressed:

1. Seed must not be mixed with fertilizer in the hydroseeding slurry mix and should not be mixed with wood fiber mulch. Fertilizer must be applied according to the current approved plan.
2. After being broadcast, seed must be incorporated into the soil through raking or another similar means that will not damage

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surface roughening features.

RECOMMENDATIONS

It is recommended that Soldier Creek follow its approved plan for interim revegetation and that seeding on the fan exploration site proceed as soon as possible. If Soldier Creek desires to change the interim revegetation methodology for this site, the modifications discussed above need to be made.