

# TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

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May 18, 2004

TO: Internal File

THRU: Gregg Galecki, lead

FROM: Joe Helfrich, Land use, Biology

RE: Mathis / Summit Creek IBC, Andalex Resources Inc., Centennial Mine, C/007/0019, Task ID# 1919

**SUMMARY:**

On May 7, 2004 the Division received an Incidental Boundary Change for the Centennial Mine. The IBC is in the Mathis tract, (20 acres), and Summit Creek Lease areas, (72.32 acres). The leases can be located on the Deadman Canyon and Helper 7.5' quadrangles in Township 12 South Ranges 10 and 11 East, Sections 31 and 36. The proposed change is for underground mining only. This memo will include a review of the Land Use and Biology sections of the regulations.

TECHNICAL MEMO

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**TECHNICAL ANALYSIS:**

**GENERAL CONTENTS**

**MAPS AND PLANS**

Regulatory Reference: 30 CFR 777.14; R645-301-140.

**Analysis:**

The vegetation map is identified as plate 19A. A portion of the Right Fork of Summit Creek is included in the proposed IBC. The map should depict the vegetation community associated with the portion of the stream course that is located in the lease area. The wildlife distribution map is identified as plate 34. The map appears to have been generated in July of 1998. The map depicts the location of raptor nests at that point in time. A current raptor inventory should be included in the application. As an alternative to the survey the applicant could provide a letter from The Division of Wildlife Resources depicting the status of any nests located in the proposed lease area. The Mule Deer, Elk and Sage Grouse ranges are also listed on plate 34. They are identified as lines but the extent of their ranges is not known. They also need to be included in the legend.

**Findings:**

The information provided is not adequate to meet the requirements of this section of the regulations. Prior to approval the applicant must provide the following in accordance with;

**R645-301-140;** Plate 19A needs to include the vegetation community associated with the portion of the right fork of Summit Creek that is located in the lease area. A current raptor survey should be included in the application. As an alternative to the survey the applicant could provide a letter from The Division of Wildlife Resources depicting the status of any nests located in the proposed lease area. The Mule Deer, Elk and Sage Grouse ranges are also listed on plate 34. They are identified as lines but the extent of their ranges is not known. The extent of their ranges needs to be included on plate 34. They also need to be included in the legend.

## ENVIRONMENTAL RESOURCE INFORMATION

Regulatory Reference: Pub. L 95-87 Sections 507(b), 508(a), and 516(b); 30 CFR 783., et. al.

### VEGETATION RESOURCE INFORMATION

Regulatory Reference: 30 CFR 783.19; R645-301-320.

#### Analysis:

The vegetation resource information is provided for in chapter three of the MRP. Text changes for this IBC include page 3-1 of the Biology section of the application. The vegetation map is identified as plate 19A. The vegetation communities for the mine plan area include Mountain –Brush, Desert-Shrub, Pinyon-Juniper Woodland, Sagebrush-Grass, Conifer-Aspen, and Minor streamside vegetative types that cover the entire mine plan area. The vegetation community for this IBC is predominately Conifer-Aspen.

The application needs to include a list of possible threatened, endangered and candidate plant species identified in the U. S. Fish and Wildlife Service current listing for Carbon County. The application has not been updated to include these current listings.

#### Findings:

The information provided is not adequate to meet the requirements of this section of the regulations. Prior to approval the applicant must provide the following in accordance with:

**R645-301-320;** The application must include a current list of threatened, endangered, and sensitive plant species for Carbon County and the current status of those species in the proposed IBC area in order for the Division to make a finding that the information contained in the application meets the requirements of this section of regulations.

### FISH AND WILDLIFE RESOURCE INFORMATION

Regulatory Reference: 30 CFR 784.21; R645-301-322.

**TECHNICAL MEMO**

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**Analysis:**

The application does not include Fish and Wildlife information as required by this section of the regulations.

**Findings:**

The information provided is not adequate to meet the requirements of this section of the regulations. Prior to approval the applicant must provide the following in accordance with;

**R645-301-322;** The applicant must address this section of the regulations.

**LAND-USE RESOURCE INFORMATION**

Regulatory Reference: 30 CFR 783.22; R645-301-411.

**Analysis:**

The Land Use resource information is provided for on page 4-1 of the application. The 92 acre parcel is located 2,600 feet above the current mine workings. As such impacts to the surface land resources should be negligible.

The area is currently used for grazing, recreation and wildlife. Section 645-301-411.110 on page 4-1 indicates that Deadman, Straight and Hoffman Canyons would fall into two categories: 1) Fish and ??? The application needs to provide the remaining information that accompanies this section. According to the application the land has also historically been used for coal mining. By the early 1900's the majority of the Book Cliffs coal field had been prospected. Knight -Ideal, Zion, Olsen, and Sutton were mines that produced coal from the Gilson and Aberdeen coal seams. An additional prospect in the Sunnyside seam produced 1,400 tons of coal in 1964.

**Findings:**

The information provided is not adequate to meet the requirements of this section of the regulations. Prior to approval the applicant must provide the following in accordance with;

**R645-301-411;** The application must include the missing information noted on page 4-1 section **R645-301-400.110** of the application.

## **MAPS, PLANS, AND CROSS SECTIONS OF RESOURCE INFORMATION**

Regulatory Reference: 30 CFR 783.24, 783.25; R645-301-323, -301-411, -301-521, -301-622, -301-722, -301-731.

### **Analysis:**

#### **Vegetation Reference Area Maps**

The vegetation reference area maps will not be affected by the addition of the Mathis/Summit Creek IBC. They are included in the current MRP.

### **Findings:**

The information provided is adequate to meet the requirements of this section of the regulations.

## **OPERATION PLAN**

## **FISH AND WILDLIFE INFORMATION**

Regulatory Reference: 30 CFR Sec. 784.21, 817.97; R645-301-322, -301-333, -301-342, -301-358.

### **Analysis:**

#### **Protection and Enhancement Plan**

The applicant has not addressed this section of the regulations.

#### **Endangered and Threatened Species**

The applicant has not addressed this section of the regulations.

#### **Bald and Golden Eagles**

The applicant has not addressed this section of the regulations.

#### **Wetlands and Habitats of Unusually High Value for Fish and Wildlife**

The applicant has not addressed this section of the regulations.

### **Findings:**

**TECHNICAL MEMO**

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The information provided is not adequate to meet the requirements of this section of the regulations. Prior to approval the applicant must provide the following in accordance with;

**R645-301-322, -301-333, -301-342, -301-358;** The applicant must address these sections of the regulations.

## **VEGETATION**

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

### **Analysis:**

Vegetation should not be affected by the addition of the Mathis/Summit IBC. There is no surface disturbance associated with this permitting activity.

### **Findings:**

The information provided in the current MRP is adequate to meet the requirements of this section of the regulations.

## **RECLAMATION PLAN**

### **GENERAL REQUIREMENTS**

Regulatory Reference: PL 95-87 Sec. 515 and 516; 30 CFR Sec. 784.13, 784.14, 784.15, 784.16, 784.17, 784.18, 784.19, 784.20, 784.21, 784.22, 784.23, 784.24, 784.25, 784.26; R645-301-231, -301-233, -301-322, -301-323, -301-331, -301-333, -301-341, -301-342, -301-411, -301-412, -301-422, -301-512, -301-513, -301-521, -301-522, -301-525, -301-526, -301-527, -301-528, -301-529, -301-531, -301-533, -301-534, -301-536, -301-537, -301-542, -301-623, -301-624, -301-625, -301-626, -301-631, -301-632, -301-731, -301-723, -301-724, -301-725, -301-726, -301-728, -301-729, -301-731, -301-732, -301-733, -301-746, -301-764, -301-830.

### **Analysis:**

The reclamation plan will not be affected by the addition of the Mathis/Summit IBC. There is no surface disturbance associated with this permitting activity.

### **Findings:**

The information provided in the current MRP is adequate to meet the requirements of this section of the regulations.

## **POSTMINING LAND USES**

Regulatory Reference: 30 CFR Sec. 784.15, 784.200, 785.16, 817.133; R645-301-412, -301-413, -301-414, -302-270, -302-271, -302-272, -302-273, -302-274, -302-275.

### **Analysis:**

The reclamation plan will not be affected by the addition of the Mathis/Summit IBC. There is no surface disturbance associated with this permitting activity.

### **Findings:**

The information provided in the current MRP is adequate to meet the requirements of this section of the regulations.

## **PROTECTION OF FISH, WILDLIFE, AND RELATED ENVIRONMENTAL VALUES**

Regulatory Reference: 30 CFR Sec. 817.97; R645-301-333, -301-342, -301-358.

### **Analysis:**

The applicant has not addressed this section of the regulations.

### **Findings:**

The information provided is not adequate to meet the requirements of this section of the regulations. Prior to approval the applicant must provide the following in accordance with;

**R645-301-333, -301-342, -301-358;** the applicant must address this section of the regulations.

## **CONTEMPORANEOUS RECLAMATION**

Regulatory Reference: 30 CFR Sec. 785.18, 817.100; R645-301-352, -301-553, -302-280, -302-281, -302-282, -302-283, -302-284.

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TECHNICAL MEMO

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**Analysis:**

Contemporaneous reclamation will not be affected by the addition of the Mathis/Summit IBC. There is no surface disturbance associated with this permitting activity.

**Findings:**

The information provided in the current MRP is adequate to meet the requirements of this section of the regulations.

**REVEGETATION**

Regulatory Reference: 30 CFR Sec. 785.18, 817.111, 817.113, 817.114, 817.116; R645-301-244, -301-353, -301-354, -301-355, -301-356, -302-280, -302-281, -302-282, -302-283, -302-284.

**Analysis:**

**Revegetation: General Requirements**

Revegetation will not be affected by the addition of the Mathis/Summit IBC. There is no surface disturbance associated with this permitting activity.

**Revegetation: Timing**

Timing will not be affected by the addition of the Mathis/Summit IBC. There is no surface disturbance associated with this permitting activity.

**Revegetation: Mulching and Other Soil Stabilizing Practices**

These practices will not be affected by the addition of the Mathis/Summit IBC. There is no surface disturbance associated with this permitting activity.

**Revegetation: Standards For Success**

Standards for success will not be affected by the addition of the Mathis/Summit IBC. There is no surface disturbance associated with this permitting activity.

**Findings:**

The information provided in the current MRP is adequate to meet the requirements of this section of the regulations.

## **MAPS, PLANS, AND CROSS SECTIONS OF RECLAMATION OPERATIONS**

Regulatory Reference: 30 CFR Sec. 784.23; R645-301-323, -301-512, -301-521, -301-542, -301-632, -301-731.

### **Analysis:**

#### **Reclamation Monitoring And Sampling Location Maps**

Reclamation monitoring and sampling location maps will not be affected by the addition of the Mathis/Summit IBC. There is no surface disturbance associated with this permitting activity.

#### **Reclamation Treatments Maps**

Reclamation treatment maps will not be affected by the addition of the Mathis/Summit IBC. There is no surface disturbance associated with this permitting activity

#### **Revegetation and Restoration of Soil Productivity**

Revegetation and restoration of soil productivity will not be affected by the addition of the Mathis/Summit IBC. There is no surface disturbance associated with this permitting activity.

### **Findings:**

The information provided in the current MRP is adequate to meet the requirements of this section of the regulations.

### **RECOMMENDATIONS:**

There are several deficiencies that need to be addressed prior to final approval.