

February 16, 1988

TO: File

FROM: James Leatherwood, Reclamation Soils Specialist 

RE: Final Reclamation Plans, North American Equities, Blazon #1 Mine, ACT/007/021, Folder No. 2, Carbon County, Utah

The reconsolidated Final Closure and Reclamation Plan submitted October 29, 1986 has been reviewed. While the submittal contains information requested by the Division (April 11, 1986), it also includes superseded information. The following comments should be addressed.

UMC 817.21 Topsoil: General Requirements - JSL

Pages VIII-I and VIII-2 in Exhibit 21 contains outdated information. These two pages should be removed.

UMC 817.22 Topsoil: Removal - JSL

In response to the Divisions April 11, 1986 comment the applicant refers the reviewer to pages 55 and 61 in Exhibit 12. Exhibit 12 contains only 30 pages. Exhibit 12 does not contain page 55 or 61. Please amend.

The Division has not approved any topsoil borrow area. All language reflecting a topsoil borrow area must be removed.

UMC 817.24 Topsoil: Redistribution - JSL

Pursuant to UMC 817.103 the Division (August 18, 1986) has approved a two foot soil redistribution depth over the underground development waste if the operator distributes calcium carbonate proportionately to the waste materials. That is, 9 tons calcium carbonate to 4190 cyd of development waste. The reclamation plan and map 8 must be updated to support this decision.

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UMC 817.25 Topsoil: Nutrients and Soil Amendments - JSL

In accordance to the approved reclamation plan permit, soil samples will be taken and analyzed to evaluate the proper level of fertilizer treatment. On November 2, 1987 (telephone conversation) Mel Coonrod and I discussed concerns to the soil analysis and fertilizer plan. We established a soil analysis and amendment plan based on climatological time constraints with on-going reclamation. Soil samples are to be taken after soil redistribution. The fertilizer is to be distributed at the same time as the arboreal transplanting in the spring.

The approved plan called for the soil to be sampled after soil redistribution. All but 75 percent of the nitrogen was to be applied this fall. The remaining nitrogen fertilizer was to be distributed in the spring. However, due to the length of time required for soil analysis and the potential threat of snowfall, there would be no time to establish an environmentally sound fertilizer plan. If a plan could be established, it would be probable that most of the water soluble nutrients would leach through the soil and pollute Mudd Creek. Vegetation would not establish until the spring of next year. There would be no vegetation to take up the nutrients. Therefore, soil samples will be taken from representative sites (as described in the plan) and analyzed. The Division will work with the operator to establish an effective fertilizer amendment plan to be implemented during the arboreal transplanting the following first spring.

UMC 817.103 Backfilling and Grading: Covering Coal and Acid- and Toxic-Forming Materials - JSL

Page 26 should be updated to reflect the August 18, 1986 DOGM submittal which approved a minimum two foot soil redistribution depth over the underground development waste when calcium carbonate is applied to the underground development waste materials at the rate of 9 tons calcium carbonate to each 4190 cubic yards of development waste. The Division does not approve a one foot depth of cover over the waste materials as requested on page 26. This request must be deleted from the plan.

cc. S. Linner
R. Summers

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