



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

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August 14, 1989

TO: Susan Linner, Permit Supervisor
FROM: Lynn Kunzler, Reclamation Biologist *LK*
RE: Review of July 21, 1989 As-Built Report, North American
Equities, Blazon #1 Mine, ACT/007/021, Folder #2, Carbon
County, Utah.

Summary:

The above referenced material has been reviewed. This response does not address all previous concerns regarding the revegetation plan and has introduced an additional comment regarding the postmining land use.

Analysis:

UMC 784.13(b)(5) and 817.111-.117

Plate 1, General Reclamation As-Built Map, has been revised to most areas that have been revegetated. While the topsoil storage area is now shown on this map, it does not indicate that this area was revegetated. This map must be an accurate reflection of site conditions.

The operator has not addressed contingency plans for reseeding areas that have experienced surface failures. While the operator planted some maple seedlings on the slide area (portal bench area), the area will need to be reseeded. The north side of Little Snyder Drainage that experienced sluffing has no apparent vegetation growing and will also require reseeding. Since the area in the Little Snyder Drainage experienced sluffing, NAE will need to provide better surface stability. This area was to have been netted (refer to discussion of Stipulation UMC 817.24-(3)-(JSL) in August 2, 1989 memo from James Leatherwood). As an option to netting (in conjunction with hydromulch and tacifier), NAE could hydroseed and apply curlex blanketing as mulch. These areas must be revegetated this fall.

The operator has not adequately addressed the following areas that were previously identified that were apparently not seeded and/or hydromulched: the cut slope east of the pad, and the disturbed area between the sediment pond and the reclaimed transformer road. Since there is an apparent lack of vegetation on these areas (as compared to areas that were seeded last fall), NAE will need to seed these areas this fall. These areas must also be shown on Plates 1 and 11.

While the operator has identified that the rocky mountain maple was not planted over the entire site (as originally planned), there is no discussion (justification) as to why maple were only planted on the portal slope, the water tank area and a small portion of the water tank access road. Without adequate justification for this action, the operator must provide plans to plant rocky mountain maple over the rest of the area prior to May 15, 1990.

Areas that require revegetation work this fall are shown on the attached sketch. Unless otherwise approved, the seed mix, rates and methods identified in the approved plan must be followed. All areas reseeded must also be mulched as per the approved plan. The area in Little Snyder Drainage must either have the polypropylene netting (install netting before seeding and hydromulching) or other approved erosion control blanket such as curlex installed. Seeding is to be conducted after October 1, 1989 and all revegetation work (except the spring planting of shrubs) is to be completed by October 31, 1989.

The operator has indicated those areas where contaminated straw was scattered and has provided an adequate weed control monitoring and control plan.

The operator has established the shrub survival monitoring transects and has shown the location of the transects on Plate 11.

The operator has identified an appropriate time that the serviceberry will be planted next spring (prior to May 15, 1990) and have provided evidence that the plants have been ordered (from the Lone Peak Nursery).

UMC 784.15 and UMC 817.133 Post Mining Land Use- LK

The operator has provided a new map (Plate 10) that identifies the boundary of the industrial vs. grazing/wildlife habitat land uses. This industrial use was only approved for the pad area, to the upper end of culvert B. This map incorrectly identifies industrial use beyond culvert B and must be corrected.

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Recommendations:

Before the Division can approve the as-built plans, NAE must address the above comments, including time frames for implementation of the necessary contingency plans.

Attachment:
cc: B-Team
BT3013/47-49