



State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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June 6, 1989

TO: Susan Linner, Permit Supervisor

FROM: James Leatherwood, Reclamation Soils Specialist

RE: Final Reclamation As-Builts and Portal Slope Erosion Mitigation Plan, North American Equities, Blazon #1 Mine, ACT/007/021, Folder #2, Carbon County, Utah

SUMMARY

The Mitigation Plan for the Portal Slope Erosion at the Blazon #1 Mine, submitted May 17, 1989, in addition to the Reclamation As-Builts, submitted May 18, 1989, have been reviewed regarding soil concerns. The As-Builts fail to address deficiencies stated in the Division's previous review, dated March 8, 1989, and the netting requirement of steep slopes. The Portal Slope Erosion Mitigation plan fails to address the mitigation of topsoil loss due to erosion.

ANALYSIS

Stipulation UMC 817.22(1) - JSL

The As-Built submittal states that a two-foot layer of cover material was placed at most locations - but does not specifically state that two feet of cover (18 inches of subsoil, 6 inches of topsoil) was placed over the underground development waste as required by the Reclamation Plan. A minimum two-foot cover (18 inches subsoil, 6 inches topsoil) must be placed over the underground development waste.

Stipulation UMC 817.24(1-3) - JSL

- (1) In accordance with the Final Reclamation Plan, Stipulation 817.24-(1) - JSL, August 29, 1988, topsoil must be topdressed over the areas in which the underground development waste material was backfilled. Due to the potential adverse physiochemical characteristics of the underground development waste, a 6 inch topsoil and 18 inch subsoil cover is required for vegetation success.

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- (2) The Final Reclamation As-Built submittal does not adequately define those areas that received topsoil. A map must be submitted defining the location and depth of topsoil placement. According to the as-built submittal, given the 2.75 acres of reclamation, over 2,218 cyd of topsoil would have been distributed. This conflicts with the cover capacity of the 287 cyd of topsoil that was available prior to reclamation. This section must be clarified.
- (3) In accordance to the Final Reclamation Plan, pg. 27 and Map 3, January 22, 1986 and stipulation UMC 817.24-(1) - JSL, October 8, 1985, Little Snyder Drainage, the portal pad area, and the steep slopes adjacent to the portal pad must have polypropylene netting anchored in place to provide stabilization and erosion control until vegetation is established. This has not be addressed in the Reclamation As-Builts. These sites must have the polypropylene netting anchored in place until vegetation establishment as required by the Reclamation Plan.

Stipulation UMC 817.103-(1) - JSL

The Division has not approved any topsoil borrow area. All language reflecting a topsoil borrow area must be removed from the Final Reclamation Plan, specifically page 61 of Exhibit 12.

c1
cc: B Team
BT51/65-66