



State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

Norman H. Bangertter
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

May 25, 1989

TO: Susan Linner, Permit Supervisor
FROM: Lynn Kunzler, Reclamation Biologist *L. K.*
RE: As-Built Plans and Site Conditions, North American Equities, Inc., Blazon #1 Mine, ACT/007/021, Folder #2, Carbon Co., Utah.

Summary:

The above referenced plans received on May 10, 1989 have been reviewed and compared to conditions found on site during visits on May 2, 12 and 15, 1989. The plans do not accurately portray site conditions or identify the reclamation activities that still need to be completed.

Analysis:

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

Plate 1, General Reclamation As-Built Map, does not adequately portray site conditions or areas receiving reclamation treatments. For example, the reclaimed portal slope was seeded and planted from the top of the highwall to the bank of Mud Creek. Little Snider drainage was seeded on both sides from the top to the drop box/overflow channel. Also, areas between Mud Creek and the access road were seeded/planted and are not shown on Plate 1. This map must be an accurate reflection of site conditions.

Please refer to the attached drawing entitled Blazon #1 Mine Revegetation for the following comments. Please note, the drawing is not necessarily to scale and the areas depicted represent only the approximate location and extent of revegetation problems. The actual size, shape and location may vary significantly:

1. During the site visits, several areas were noted that have either sluffed/or experienced slides (surface failure). This type of instability generally removes seeded materials and

thus would require retreatment of revegetation practices. Since the area in the Little Snider Drainage experienced sluffing (the area was hydromulched), NAE will need to provide better surface stability such as using curlex blankets as mulch. The slide area on the reclaimed portal slope will need to be revegetated.

2. Several areas were observed in the field that were not hydromulched as required by the plan, including the topsoil storage area and culvert A, the cut slope east of the pad, the disturbed area between the sediment pond and the reclaimed transformer road, and disturbed areas between Mud Creek and the access road. The Division is uncertain at this time whether these same areas were seeded or not. NAE will be required to (sic) reseed and mulch these areas if adequate vegetation does not establish this year (Adequate vegetation in this instance refers to the general level of vegetation on these sites as compared to other revegetated areas and not to meeting the revegetation success criteria). Also, these areas need to be indicated on Plate 1.

3. Several areas were observed where straw had been scattered. As noted in previous correspondence, this straw was contaminated with viable noxious weed seed. Depending on the establishment of the noxious weeds and the type and level of weed control needed, these areas may also require revegetation after weed control.

NAE is committed to monitor shrub survival of transplanted shrubs during the first three years after planting. Please note, in order for this to be an accurate reflection of mortality, survival transects must be established within the first week or two following planting. In conversations with Earthfax, a deadline of June 1, 1989 was given to establish a minimum of 4 transects. The location of the transects are to be shown on the reclamation as-built map (Plate 1).

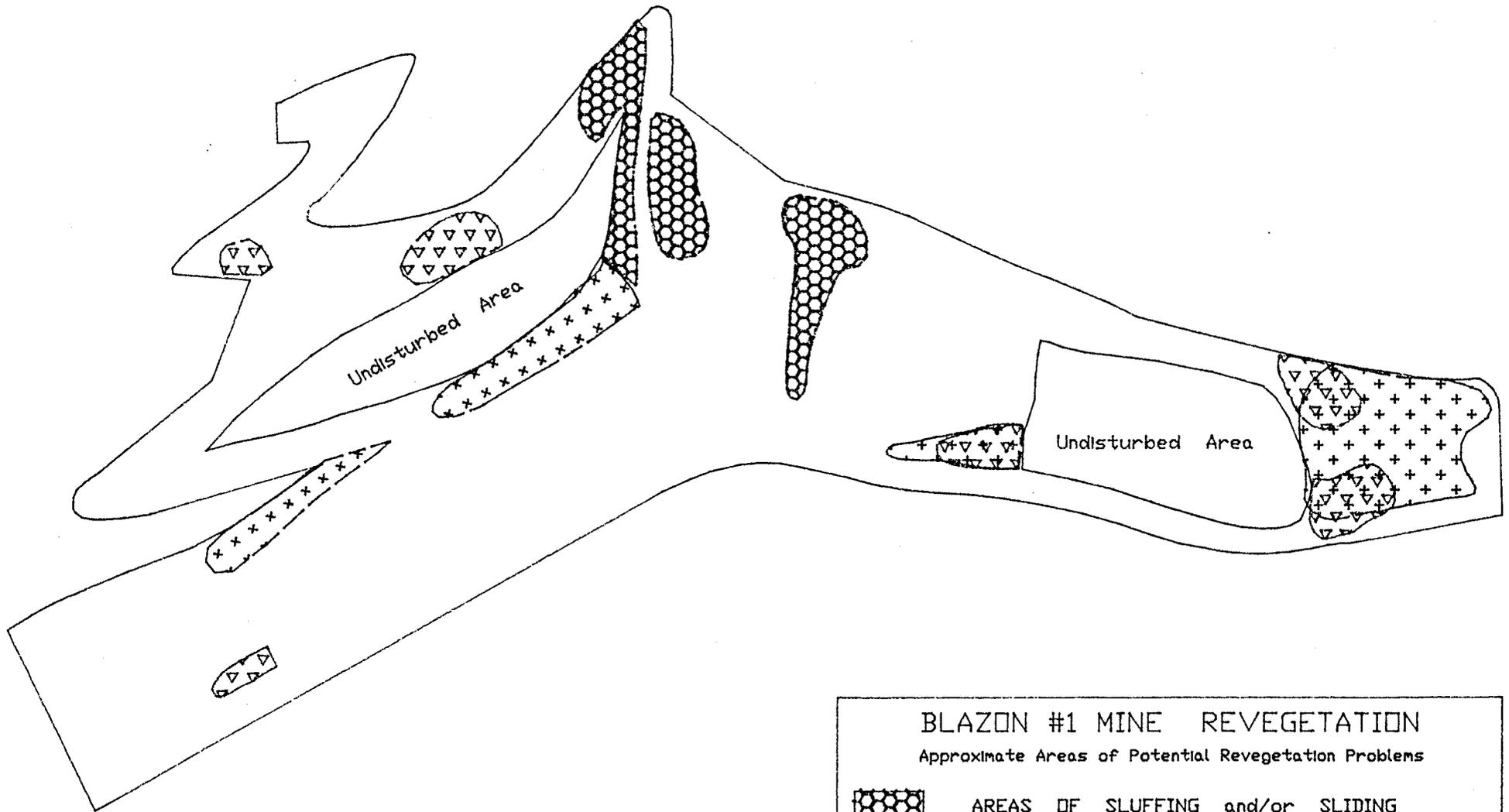
As per the contingency plan to plant serviceberry next spring (Spring of 1990), the plan did not identify the planting window. Please note, these plants must be planted prior to May 15, 1990 and the plan must so indicate this. Also, Several nurseries indicated to the Division that the requested plants would have been available for this year (1989) had they been ordered by November-December of 1988. Since the company was told to order plants last fall and failed to do so, The Division will request proof that the plants have been ordered before final approval of this contingency measure. This proof must be submitted to DOGM prior to June 15, 1989.

ACT/007/021
May 25, 1989
Page 3

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 and the submittal of an accurate as-built map. Before the serviceberry contingency plan can be approved, the 1990 planting window must be identified and proof that the serviceberry plants are ordered must be provided to DOGM.

Attachment
cc: B-team
BT3013/24-26



Drawn May 19, 1989

BLAZON #1 MINE REVEGETATION	
Approximate Areas of Potential Revegetation Problems	
	AREAS OF SLUFFING and/or SLIDING
	AREAS NOT HYDROMULCHED and/or SEEDED
	AREAS OF CONTAMINATED STRAW SCATTERING