0005

007/033 #2

ANDALEX
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Tower Division

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cc: Henry, Jess, Susan

July 13, 1994

State of Utah
Department of Natural Resources
Division of Oil, Gas & Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

RECEIVED
JUL 14 1994
DIV. OF OIL, GAS & MINING

Attn: Daron Haddock
Permit Supervisor

Re: ACT 007/033, Expansion

Dear Mr. Haddock:

Following an on-site meeting with Susan White and Henry Sauer, I am submitting revisions to applicable portions of the above referenced MRP which will address handling of topsoil, restacking of topsoil and revegetation requirements.

The proposal surface facilities plate now shows a cross-section of the proposed new topsoil stockpile showing height and width as well as berm dimensions.? Surface area and surface roughness will be maximized.

As we discussed in the field, and as is now portrayed in our MRP text, Andalex proposes to try various revegetation techniques this fall on the new topsoil pile. Also, in the interim, we have committed to trying to establish a ground cover crop/green manure by raking in a species, such as barley, and applying water. Areas from which existing topsoil piles have been removed and areas previously designated as undisturbed will be seeded and mulched this fall (October) with the recommended seed mixture. This will follow removal of coal fines to the extent possible.

The new topsoil stockpile will be mulched with non-weedy alfalfa at the rate of three to four tons per acre. Excelsior matting will be used on a section of the pile, approximately 40 feet wide, as an erosion control technique experiment.

Within the boundary of the new proposed disturbed area, Andalex intends to use borrow fill material for stockpile pad construction. The size of this area will be kept to a minimum and prior to the fill being borrowed, topsoil will be gathered and stocked in the new pile on the west side to a depth of twelve inches. piled

The amount of fill expected to be borrowed from the new disturbed area is approximately 3000 cubic yards. Existing fill / cut material will be used wherever possible.

Andalex plans to use a portion of its boney reject material for fill material in the base of the new truck dump loop. Upon final reclamation, this material will be disposed of according to our approved MRP. Characterization of this material is included with this submittal. Fax Check MRP required analyses

I hope the attached information is adequate to address our discussions in the field.

Please call if you have any questions.

Sincerely,

Michael W. Glasson,
Senior Geologist

Enclosures

cc: Susan White
Henry Sauer

Topsoil piles A, B, C and D have been earmarked for moving away from the coal storage piles to the west side of Wildcat where they will no longer be subjected to wind-borne coal fines. These piles represent a total volume of 297,647 ft^3. To the extent possible coal fines will be vacuumed from the surface of the existing topsoil piles prior to their movement. The new topsoil pile will be a long, narrow pile situated adjacent to the existing topsoil pile on the west side. The new pile will be approximately 10 feet in height, 75 feet wide and 500 feet long. Slopes on the topsoil pile will not exceed 2V:1H. A containment berm will be constructed around the perimeter of the pile to a minimum height of two feet. Surface area and surface roughness should be maximized to allow microbial activity and organic matter cycling. The new topsoil pile, as well as areas where existing topsoil piles have been removed, will be reclaimed in between October 1 and October 14, 1994, broadcasting the following pure live seed mixture to the extent possible: (Andalex will provide the Division with the seed label which will include elevation, county, variety and source of each seed species used).

Fairway crested wheatgrass	4 lb/ac
Bozoisky Russian wildrye	4 lb/ac
Arriba Western wheatgrass	4 lb/ac
Nezpar Indian ricegrass	4 lb/ac
Critana thickspike wheatgrass	4 lb/ac
Forage Kochia	4 lb/ac
Rincon Fourwing saltbush	4 lb/ac
Shadscale	2 lb/ac
Gordon Creek Wyoming sagebrush	.5 lb/ac
Castle Valley Gardner saltbush	2 lb/ac

Andalex proposes the use of several techniques in order to measure revegetation success. These will include the use of non-weedy alfalfa mulch at the rate of three to four tons per acre as well as excelsior matting and chicken wire for erosion control. Mulch will be crimped in on the topsoil pile and in the areas previously designated as undisturbed a light application of water will be applied immediately after seeding. It is also proposed that in the Fall of 1994 designated areas of both the topsoil pile and the

Revised 7/13/94

? Type + Rate?

previously undisturbed areas will be fertilized using a phosphate-type product. It should be noted that prior to revegetation of the areas previously designated as undisturbed coal fines will be vacuumed to the extent possible. Also, if deemed necessary in future years, coal fines will be vacuumed in areas where revegetation could potentially be affected adversely.

Within 7 days of moving

The topsoil piles will be moved in the Summer of 1994. Prior to the final seeding in October, Andalex will provide an interim ground cover on the new topsoil pile consisting of grass (barley) 30 lbs/ac Barley seed will be raked in and watered daily until germination to initiate germination. Andalex does not propose any interim revegetation on the areas previously designated as undisturbed or areas where topsoil piles have been moved. It should be noted that areas from which topsoil piles are being removed and on the area where fill material will be borrowed additional topsoil will be gathered to a depth of twelve inches and placed on the new topsoil storage pile on the west side.

The area from which fill will be borrowed will be kept to a minimum; it is estimated that approximately 3000 yards of material will be required for the stockpile pad. Andalex is also intending to use boney reject material from its storage pile currently on the west side of Wildcat for use as fill in the road construction where the new truck dump will be located. This material has been classified as non-toxic and non-acid forming and upon final reclamation will be segregated and disposed of according to Andalex's approved Mining and Reclamation Plan. (Please refer to Andalex's Proposed Surface Facilities Plate for the location of the above referenced facilities including truck dump, stacker and topsoil piles.)

Revised 7/13/94

4. Backfilling, Grading, and Soil Replacement and Stabilization

All disturbed areas will be backfilled and graded to as near as possible the approximate original contour with the exception of the natural drainage which came through the loadout site prior to Swisher Coal Company's establishment of their loadout facility. Andalex has diverted this natural drainage and will provide permanent protection of this diversion once reclamation is complete. Please refer to this chapter, Part K, Section 4.1, re Undisturbed Diversions for more detail. Slopes shall not exceed the angle of repose or such lessor slopes as required by the regulatory authority to maintain stability. Fill material will be compacted to assure stability. This is a flat lying area and therefore stabilization should be achieved easily.

Areas which will be backfilled include foundation areas such as the loadout, the reclaim tunnels (including the expanded reclaim system), and the truck dumps. All backfilled and regraded areas, including the Wildcat Expansion areas, will be reclaimed simultaneously.

Revised 04/21/94, 05/13/94, 7/13/94