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

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July 22, 1994

TO: Daron Haddock, Permit Supervisor

FROM: Susan M. White, Senior Reclamation Biologist *SMW*

RE: Draft Review, Amendment to Abate NOV N94-34-1-3, Part 1 of 3 and Part 2 of 3, Andalex Resources, Inc., Wildcat Loadout, ACT/007/033-94C, Folder #2, Carbon County, Utah

SYNOPSIS

Michael Glasson of Andalex Resources submitted a second response to the abatement plan for the above referenced notice of violation. This memo will review that submittal.

ANALYSIS

The submittal dated 7/14/94, pages 80-A and 80-B must be denied. Page 80-A discusses a new seed mixture. This seed mixture should only be used on the topsoil pile and not on other areas as discussed on page 80-A. This new seed mixture should be tested on the topsoil pile prior to extensive use throughout the site. The currently approved seed mixture in the plan must be used on areas where the existing topsoil piles have been removed and where coal has been cleaned up on the previously undisturbed area. Page 80-A also states that a light application of water will be applied immediately after seeding, this statement is not approved.

Page 80-B commits to seeding the new topsoil pile with an annual grain. Now, that the topsoil pile will not be graded until after September this technique is not approved.

In accordance with R645-301-341.300, the operator has committed to demonstration plots on the new topsoil pile. Page 80-A does not contain sufficient detail to assess this commitment. Michael Glasson has committed to a meeting with the Division on August 11, 1994 to work out the details of this demonstration plot.

RECOMMENDATION

The amended pages 80-A and 80-B dated 7/13/94 may not be approved. The operator should be allowed to relocate the topsoil piles and the details of the piles' revegetation will be decided at the August 11 meeting.

