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

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June 2, 1994

TO: File

FROM: Henry Sauer, Senior Reclamation Soils Specialist *HS*

RE: Amendment to Abate Notice of Violation N94-34-1-3, Parts 1 & 2 of 3, Andalex Resources, Inc., ACT/007/033-94C, Folder #2, Carbon County, Utah

SYNOPSIS

The permittee has submitted (received April 25, 1994) an amendment proposal to relocate four topsoil stockpiles (N94-34-1-3, Part 1) and remove deposited coal fines from a previously undesignated disturbed area (N94-34-1-3, Part 2).

The aforementioned proposal stimulate the issue of reclaimability. Revegetation of the majority of the topsoil stockpiles has been marginally successful. Weed proliferation has been excessive and may jeopardize establishment of perennial vegetation on the relocated topsoil as well as at the time of final reclamation. The poor success on the revegetation test plots, which are aimed at demonstrating the suitability of the proposed substitute topsoil material (i.e. fill material) on site, has been an ongoing concern of the Division. A qualitative vegetative survey of the test plots must be arranged for the middle of the summer. This survey must be completed and results discussed with Division staff prior to seedbed preparation and seeding of the relocated topsoil stockpile(s) and areas impacted with coal fines.

The proposed amendment is not adequate. The issues enumerated must be adequately addressed prior to approval of Amendment ACT/007/033-94C.

ANALYSIS

R645-301-244. Soil Stabilization

The permittee must submit topsoil stockpile plans, cross-sections and designs which adequately depict the maximum depth, maximum slope and all pertinent stockpile dimensions (including



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size and location of containment berms). The permittee must design the stockpile(s) to maximize surface area and surface roughness. This will effectively increase the volume of topsoil exploited by perennial plant roots, microbial activity and organic matter cycling and increase water infiltration and reduce slope length and slope gradient.

The proposed amendment is silent as to the reclamation of the stockpile areas after removal of topsoil. In addition, the proposed amendment calls for reclamation of the previously undesignated disturbed area by removal of coal fines in the Spring of 1994 but remains silent as to interim revegetation procedures subsequent to fine removal.

R645-301-234. Topsoil Storage

The permittee must identify the type and rate of mulch applied on the stockpile(s). The Division strongly recommends the **incorporation** of non-weedy alfalfa mulch at a rate of three to four tons per acre. To prevent nitrogen immobilization inorganic fertilizer, in addition to the recommended fertilization rate, may need to be applied at the time of mulch incorporation.

The permittee must identify the topsoil stockpile seed mixture and rate of application. In addition the permittee must state whether or not fertilizer will be used, and if so the type and rate of fertilizer to be applied.

Relocation of the topsoil stockpiles must occur immediately prior to the normal seeding time (i.e. October). If the permittee chooses to relocate the stockpiles prior to this time then interim erosion control and seeding must be accomplished.

RECOMMENDATION

The issues enumerated must be adequately addressed prior to approval of Amendment ACT/007/033-94C.