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

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TO: File

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

DATE: June 3, 1994

RE: 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

The above referenced amendment is designed to prevent and clean contamination of wind-borne coal fines on the topsoil stockpiles and undisturbed areas. The amendment calls for relocating the topsoil piles, including the coal fine affected area in the disturbed area, and installation of drift fences.

ANALYSIS

The relocation of the topsoil piles to the east side of the site should greatly reduce the coal fine contamination. However, the piles must not be moved until the October seeding window is opened. Otherwise the piles will be contained with the abundant weeds on site. Weed competition in this arid environment is known to out compete the desirable species, and eliminate the chance for revegetation success. The commitment to revegetate the piles is a meaningless commitment in light of previous attempts at revegetation. The plan does not provide any details as to how this revegetation effort will succeed.

The Division knows that surface roughness (land imprinting) is very important to revegetation success in this type of arid climate. The operator's past attempts at surface roughness have been half-hearted and roughness disappears with the first moisture or wind on site. Therefore, the operator must provide exact methodology and dimensions of surface roughness on the topsoil piles that will be achieved. I also recommend to the operator that an erosion control matting be used on the piles in order to hold the surface roughness.

Since weed seed is so prevalent on site, the chance of revegetation success with an interim seed mixture may be greater



since the more aggressive interim species should out compete the weeds. Listed below is a suggested mixture that should be broadcast seeded and then lightly raked into the soil surface. Two-thirds of the mixture should be applied before the erosion control matting and then an over seeding of the remaining seed after installation of the matting.

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

When obtaining seed for the topsoil piles, every effort must be made to obtain seed from similar elevation, geographic area and precipitation zones as the Wildcat Loadout. A commitment must be made to provide to the Division the seed label with elevation, county, variety and source of each seed species.

A commitment must be made in the permit that the seeding of the topsoil piles will occur between October 1 and December 1.

#### RECOMMENDATIONS

To date, very limited revegetation success and thus reclaimability has been demonstrated at the Wildcat Loadout. This fact of unreclaimability has important consequences for the operator for future expansion. I would suggest that the operator and the Division have an on site meeting to assess the recent revegetation test plots and discuss future revegetation efforts. The operator must be committed to reducing the amount of weeds on site. Prior to acceptance of this submittal, the operator must address the above noted deficiencies and commitments.

cc: Henry Sauer  
Jesse Kelley  
Steve Johnson  
Steve Demczak