

# TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

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February 4, 2004

TO: Internal File

THRU: Dana Dean, P.E., Team Lead, Environmental Scientist, Hydrology.

FROM: Jerriann Ernstsens, Ph.D., Environmental Scientist, Biology.

RE: Refuse Pile and PMLU, Plateau Mining Co., Willow Creek Mine, C/007/0038,  
Task ID #1788

## **SUMMARY:**

The Division received an amendment, on January 6, 2004 and determined the significant revision administratively complete on January 26, 2004. This amendment addresses the refuse pile and post mine land use change at the Willow Creek Mine. This memo describes changes to the final seed mix for the reclamation project.

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**TECHNICAL ANALYSIS:**

# RECLAMATION PLAN

## GENERAL REQUIREMENTS

Regulatory Reference: PL 95-87 Sec. 515 and 516; 30 CFR Sec. 784.13, 784.14, 784.15, 784.16, 784.17, 784.18, 784.19, 784.20, 784.21, 784.22, 784.23, 784.24, 784.25, 784.26; R645-301-231, -301-233, -301-322, -301-323, -301-331, -301-333, -301-341, -301-342, -301-411, -301-412, -301-422, -301-512, -301-513, -301-521, -301-522, -301-525, -301-526, -301-527, -301-528, -301-529, -301-531, -301-533, -301-534, -301-536, -301-537, -301-542, -301-623, -301-624, -301-625, -301-626, -301-631, -301-632, -301-731, -301-723, -301-724, -301-725, -301-726, -301-728, -301-729, -301-731, -301-732, -301-733, -301-746, -301-764, -301-830.

### Analysis:

The Permittee made the following adjustments to the upland seed mix (Table 5.3-2): (personal communications December 1<sup>st</sup>, 8<sup>th</sup> 2003 and January 8<sup>th</sup> 2004):

- Added two shrub species: Mountain Big Sage and Utah Serviceberry
- Removed two non-native species: Intermediate Wheatgrass and Yellow Sweetclover
- Replaced one forb species: Blueleaf Aster with Showy Goldeneye
- Changed the pounds per acre for a few of the species.
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The Permittee must provide an additional table showing the changed seed mix (R645-301-121.200). The Division recommends retaining Table 5.3-2 and labeling the additional table as Table 5.3-2b. Retaining the table with the out-dated upland seed mix is necessary in case the Permittee used the out-dated mix for previous projects.

### Findings:

The Division considers information in the application inadequate to meet the minimum General Requirements section of the Reclamation Plan regulations. Prior to approval, the Permittee must act in accordance with the following:

**R645-301-121.200**, The Permittee must provide an additional table showing the seed mix changes. See “Analysis” section for DOGM’s recommendations.

### **RECOMMENDATIONS:**

Do not approve the amendment until the Permittee addresses all deficiencies.