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

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December 19, 1997

TO: File

THRU: Daron Haddock, Permit Supervisor *RDH*

FROM: Robert Davidson, Soils Reclamation Specialist *RAD*

RE: Deficiency List of the Mining and Reclamation, Canyon Fuel Company, LLC, Dugout Canyon Mine, PRO/007/039-PM97A-1, Folder #2, Carbon County, Utah

FINDINGS LIST:

**ENVIRONMENTAL RESOURCE
INFORMATION**

SOILS RESOURCE INFORMATION

Regulatory Reference: 30 CFR Sec. 783.21, 817.200(c); R645-301-220, -301-411.

Findings:

The information provided meets the regulatory requirements.

OPERATION PLAN

TOPSOIL AND SUBSOIL

Regulatory Reference: 30 CFR Sec. 817.22; R645-301-230.

Findings:

The permittee must provide the following, prior to approval, in accordance with the requirements of:

R645-301-232.700 and R645-301-120, The MRP needs to identify the exact locations where soils will be left-in-place on steep hillsides and which slopes will receive

geotextile fabric. Slope angle and cross sections should clearly verify which slopes will receive geotextile fabric. This information is vital for the accurate locations for fabric placement and removal during operations and reclamation.

R645-301-624.220, R645-301-724.300, R645-301-724.500 and R645-301-731.300, Demonstrate the suitability of the imported fill by determining if the fill is acid-and/or toxic-forming.

R645-301-234.210, (1) Dugout Mine Topsoil Stockpile. As shown, the Dugout Mine topsoil storage area will be located over the leach field pad area. The topsoil stockpile may be adversely impacted because of possible maintenance problems associated with the leach field. Therefore, to avoid possible future disturbance to the stockpile, the stockpile must be placed elsewhere within the permit other than over the leachfield.

(2) Dugout Substitute Stockpile located at the Soldier Canyon Mine Stockpile Area. How will access and maintenance of the soil stockpiles at the Soldier Canyon Mine stockpile area be affected with the location and size of the Dugout Mine substitute stockpile.

R645-301-234 and R645-301-120, Section 231.400 gives the construction, modification, use, and maintenance of the topsoil storage piles. However, the MRP does not state any of the specific technical information associated with the construction of the substitute topsoil stockpile. Additional information is necessary to determine whether the substitute soil and/or topsoil stockpile will contain the necessary volumes of salvaged soil. Cross sections are needed to access outslopes of the stockpiles.

R645-301-521 and R645-301-120, (1) The surface facility map (5-2A) does not show the location of the topsoil stockpile.

(2) The Surface Facilities cross section map (5-2B) does not show the following: (A) change in surface topography resulting from soil salvage, and (B) the surface changes associated with construction and placement of the topsoil stockpile.

R645-301-234 Recommendation, Vegetation removed from the site during or prior to topsoil stripping should be placed on and in the topsoil stockpile.

RECLAMATION PLAN

TOPSOIL AND SUBSOIL

Regulatory Reference: 30 CFR Sec. 817.22; R645-301-240.

Findings:

The permittee must provide the following, prior to approval, in accordance with the requirements of:

R645-301-233, The MRP does not designate the handling or disposal of the imported fills used for culvert installation and pad construction removed during reclamation. If the fills will be used for backfill and/or growth medium, they need to be characterized according to the Division's guidelines for topsoil and overburden. This characterization needs to be performed at the time of reclamation to ensure the suitability of the material.

R645-301-240 and R645-301-120, (1) If the areas of in-place covered topsoil (geotextile) are too steep to remove soil, then how will the topsoil be loosened in revegetation efforts so that it remains on the slope? The reclamation plan is too general without enough detail to ensure reclaimability of the steep slopes with in-place covered soils.

(2) The typical reclamation channel explanation given in the MRP nullifies leaving in-place soils since the reclamation slopes will be altered.