

## OGMCOAL - Dugout- Degas Reclamation

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**From:** Steve Christensen  
**To:** vmiller@archcoal.com  
**Date:** 8/27/2012 10:29 AM  
**Subject:** Dugout- Degas Reclamation  
**CC:** Amanda Daniels; Daron Haddock; OGMCOAL; Priscilla Burton  
**Attachments:** 20120827111347.pdf

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Hi Vicky,

I just tried calling you a couple of times and my call won't go through. Perhaps you're experiencing phone troubles. At any rate, I did a cursory review of the Dugout degas amendment and found a few sections that discuss the use of mulch/tackifiers and seeding (See attached 1st and 2nd pages). Based on our phone conversation last week regarding the reclamation of G-18, G-31 and the associated access road, I thought I'd pass these pages along. Based on the approved MRP, it seems fairly clear to me that mulch/tackifier will be applied on top of the seed (See Section 341.200, 1st and 3rd paragraph). If you have a different interpretation or want to go another route than what's in the plan, we'll need to discuss that and probably pretty quick given the current status of the reclamation work on G-18, G-31 and the access road...not to mention the weather.

The 3rd and 4th pages of the attachment discuss the post-mining land use and approximate original contours. I included them as an fyi.

Give me a call when you get a chance and we can discuss this if need be.

Thanks,  
Steve

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For well sites G-25 and G-26 the analysis of soils salvaged and stockpiled as growth medium will include pH, EC, %CO<sub>3</sub> (rather than total carbon), SAR, water holding capacity, fertility (N, P, K) and texture. Testing of the topsoil will be done according to Table 6 of the Division's Topsoil and Overburden Guidelines. Results of these analyses will be incorporated into Attachment 2-1 and 2-2.

## **244 Soil Stabilization**

### **244.100 Protection and Stabilization of Surface Area**

All reclaimed areas will be stabilized to control erosion by application of mulch, tackifier, and roughening of the surface. The areas will be graded to the approximately original topographic configuration. Seeding will be accomplished with the application of seeds and mulch with a long fiber tackifier or broadcast. Methods of protection and stabilization are further discussed in Chapter 3, Section 341.

### **244.200 Mulch Application**

Mulch/tackifier will be applied to stabilize the soil on all areas that have been regraded and covered with growth media. For further discussion of revegetation practices to be utilized, see Chapter 3, Section 341.

### **244.300 Rills and Gullies**

Postmining Land Use and Revegetation - Rills and gullies that are approximately nine (9) inches in depth and disrupt the postmining land use or reestablishment of vegetative cover will be regraded and seeded. In addition, the repair of rills and gullies will assist in the maintenance of water quality standards.

### 341.200 Descriptions

**Species and Amounts of Seed** - The well sites, G-22 access road and AMV road will be planted with the seed mix listed on Table 3-2. The seed mix will be used in both contemporaneous and final reclamation phases. The seed will be incorporated with a small amount of wood fiber mulch and applied by hydroseeding equipment or broadcast. Refer to Section 234.200 for topsoil stockpile seeding description.

**Methods Used for Planting and Seeding** - The degassification sites will be graded to final contour, then ripped to relieve compaction. The depth of ripping will be from 18 to 24 inches. Following ripping, topsoil will be applied to the ripped surface and left in a gouged and roughened state.

**Mulching Techniques** - Wood fiber mulch will be applied on top of the seed with hydroseeding equipment at the rate of 2,000 pounds per acre and anchored with a tackifier in amounts specified by the manufacturer. Vegetation is salvaged with the topsoil and thus provides a mulch when the topsoil is redistributed. When the seed is broadcast, mulch will be used when determined necessary for vegetation establishment.

**Irrigation, Pest, and Disease Control** - No irrigation is planned and pesticides will not be used unless previously approved by the Division.

**Measures Proposed for Revegetation Success** - Refer to Section 356.

### 341.300 Greenhouse Studies, Field Trials or Other Equivalent Studies

Refer to the Section 341.300 of the approved M&RP.

#### **411.200 Previous Mining Activity**

Dugout Canyon has no knowledge of previous removal of coal or other minerals in the well site areas.

#### **412 Reclamation Plan**

##### **412.100 Postmining Land-Use Plan**

All uses of the land prior to the wells construction/operation and the capacity of the land to support prior alternate uses will remain available throughout the life of the sites.

Dugout Canyon intends the postmining land use to be livestock and wildlife grazing and other uses as dictated by the land owner (hunting, roads, corrals, stock ponds, etc.). Final reclamation activities will be completed in a manner to provide the lands able to parallel the premining land use.

##### **412.200 Land Owner or Surface Manager Comments**

Milton & Ardith Thayn Trust is the landowner. Canyon Fuel Company, LLC has a surface land owner agreement with the Thayne Trust for the drilling of degassification holes (Attachment 4-2). Prior to drilling the landowner will be contacted and the requirements related to drilling as outlined in the surface land owner agreement will be met. A copy of the letter will be included in Attachment 4-2.

#### **413 Performance Standards**

##### **413.100 Postmining Land Use**

Postmining land uses are discussed in Section 412.100. The postmining lands will be reclaimed in a timely manner and capable of supporting such uses (see Chapters 2, 3, 5, and 7).

## **552 Permanent Features**

### **552.100 Small Depressions**

No permanent small depressions will be created as part of the well site, G-22 access road or AMV road construction and reclamation.

### **552.200 Permanent Impoundments**

See Section 515.200 of this submittal.

## **553 Backfilling and Grading**

### **553.100 Disturbed Area Backfilling and Grading**

**Approximate Original Contour** - The well sites, G-22 access road and AMV road will be returned to their approximate original contour after reclamation is completed.

**Erosion and Water Pollution** - Sediment controls will consist of gouging the surface to create depressions and mounds which store and impede the movement of water. As vegetation becomes established on the reclaimed surface, erosion potential will be further minimized.

**Post-Mining Land Use** - The disturbed area will be reclaimed in a manner that supports the approved post-mining land use. Refer to Sections 411 and 412 for additional detail.

### **553.200 Spoil and Waste**

**Spoil** - No spoil will be generated within the well sites.