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

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September 13, 1995

file

TO: Daron Haddock, Permit Supervisor
FROM: Susan M. White, Senior Reclamation Biologist *SMW*
RE: Reclamation Plan Changes (8/3/95), J. B. King Mine,
Western States Minerals, ACT/015/002-94C, File #2,
Emery County, Utah

SYNOPSIS

As built maps and proposed work of the 1994 site work were submitted in a format suitable for insertion into the permit, date received August 3, 1995. Also included in this submittal is an erosion monitoring plan.

ANALYSIS

Amendment 94C, although excessive and bulky, is acceptable to be amended to the permit. However, several items need to be address either now or in the near future.

Section UMC 784.15 - RECLAMATION PLAN: POSTMINING LAND USE contains a letter from State of Utah, Trust Land Manager, dated September 14, 1994, which agrees with the operator that the sediment pond should be left at the time of final bond release. However, the letter from State Lands does not commit to sound future maintenance of the pond as required by R645-301-880.320. This commitment from the land owner is required prior to Phase II bond release and Division approval for the pond to remain.

Section UMC 817.110 - Erosion Monitoring Plan and Standard for Bond Release identifies three elements to the monitoring program. These are a series of permanent on site transects, a recording rain gauge, and a series of off site transects. The first two elements at this writing are in place, the off site transects have yet to be selected and placed. The transects will be surveyed in the spring and fall of the year and a cross sectional view with geographical features depicted can be generated. The Operator will demonstrate that "Normal Erosion" rates for the site as a whole has been met. "Normal Erosion" will be determined by the data collected from off site monitoring. "Normal Erosion" is defined as:



Gradual erosion of land used by man which does not greatly exceed natural erosion and is not greater than the rate of formation of the soil mantle by natural weathering processes.

Selection of the off site erosional transects that are comparable to on-site conditions is still an item yet to be approved as part of the monitoring program. Selecting locations of off site monitoring points which are comparable to the reclaimed site may be difficult due to soils, topography, and other physical attributes which differ greatly than those found on site. Also, the specific quantitative parameters which will be used to demonstrate that normal erosion rates have been achieved have not been specified in the plan. Establishing specific quantitative parameters may best be evaluated after a few years of data have been collected. Approval of the erosion monitoring plan should be conditioned upon: 1) a complete review of all data collected after a two year period from which a quantitative standard will be established and; 2) selection of off site monitoring transects.

RECOMMENDATION

The submitted amendment, 94C, may be approved for inclusion in the permit. The sediment pond is not approved for retention until the land owner commits to the Division to provide for sound future maintenance of the pond. The erosion monitoring program may be approved with the conditions that: 1) a quantitative standard for bond release will be established after review of two years of data and; 2) off site monitoring transects must be approved by the Division.

ls
cc: Sharon Falvey