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

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DIVISION OF OIL
GAS & MINING PRICE UTAH

August 27, 1992

Mr. Lee Edmonson
CALMAT Company
Properties Division
1801 East University Drive
Phoenix, Arizona 85034

Dear Mr. Edmonson:

Re: Vegetation at Hidden Valley Mine, Hidden Valley Coal Company, Hidden Valley Mine, ACT/015/007, Folder #2, Emery County, Utah

Susan White, the biologist on my staff, visited the Hidden Valley Mine site on August 20, 1992. A dense stand of Halogeton (Halogeton glomeratus) was observed during this site visit. More precipitation has occurred during the 1991/1992 growing season than during other years since the site was seeded.

Currently, weedy vegetation is dense. The perennial vegetation has also increased, although considerably less than would be expected during good precipitation years. This is possibly due to the fact that not enough perennial seed was stored in the soil for germination.

In a letter to the Division dated July 31, 1992, concern for redisturbance of the soil and further enhancement of Halogeton was expressed by Mr. Joseph Jarvis regarding this mine site. The Division agrees that disturbance would enhance Halogeton establishment. However, perennial seed must be available for plant growth to out compete Halogeton. A method of seeding which does not significantly disturb the soil surface could be devised, such as pressing the seed into the soil to provide enough seed/soil contact for germination.

Precipitation and thus, vegetation establishment, is not predictable in this arid environment. However, success standards in the Utah Coal Regulatory Program require vegetation establishment and not just seeding. Several attempts at seeding may be required for the right climactic events to produce an acceptable vegetative cover.

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It is, therefore, recommended that the entire disturbed area be reseeded this fall. Reseeding will restart the period of extended liability. This is only a recommendation and is not mandatory. However, the Division believes that it is in the best interest of the operator in light of vegetative final bond release requirements.

If you have any questions, please call me.

Sincerely,

Pamela Grubaugh-Littig
Permit Supervisor

pgl
cc: Bill Malencik
Tom Munson
Susan White
015007SM