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CONSULTANTS GROUP

GEOLOGY ENGINEERING ENVIRONMENT HYDROLOGY

July 31, 1992

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DIV. OIL, GAS, MINING

Ms. Pam Grubaugh-Littig
Permit Supervisor
Utah Division of Oil, Gas and Mining
3 Triad Center, Suite 350
Salt Lake City, Utah 84180

Dear Ms. Grubaugh-Littig:

JBR Consultants Group, as Hidden Valley Coal Company's representative, would like to respond to some of the statements made in the June 24, 1992 Inspection Report for the Hidden Valley Mine. Specifically, the statements concerning the presence of halogeton (Halogeton glomeratus) on the revegetated road.

As mentioned in the report, there is a significant amount of halogeton present on the upper portion of the road above the gate. The transect work mentioned in the July, 1992 inspection report was not statistically acceptable, thus, the results are not indicative of the actual situation. Acceptable vegetation transect work will be completed by JBR in the early fall to monitor the progression of the seeded plant communities. Halogeton has been present on the site prior to and since reclamation work was initiated in 1986.

Although halogeton is regarded as a poisonous plant, there has been no evidence, nor have there been any reports of, livestock or wildlife consuming the plant at the reclamation site. Rarely are antelope or mule deer tracks observed at the site and this usually occurs in the winter or spring. There is no available water at the site to concentrate livestock. The livestock grazing in the area is cattle from November through March. Cattle normally are not affected by halogeton unless they are forced to feed only on the plant and cannot obtain other sources of forage. Also, the plant is an annual and is dead during the permitted grazing season.

Halogeton has invaded the reclaimed site, especially on the road where it grows during the summer months. Halogeton will quickly invade mechanically disturbed sites and further disturbance only enhances the halogeton crop. Chemical eradication of halogeton is partially successful but also affects the forbs and shrubs present. Effective control also requires the immediate establishment of a plant cover to forestall the re-invasion by halogeton. Immediate establishment of plant cover at Hidden Valley is not predictable based on the results from past efforts.

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Halogeton control has never been completely successful as evidenced by its ubiquitous presence on disturbed sites in the Great Basin and the Colorado Plateau regions.

Although the post mining land use is livestock and wildlife grazing, as the inspection report notes, this use will not be implemented until reclamation vegetation is well established.

Desirable plant species have also become established in the same areas with halogeton and have greatly improved this year due to the favorable precipitation pattern. The successional pattern on the roadway below the gate indicates desirable species will compete with halogeton and stabilize the surface. We expect this successional pattern to repeat itself on the upper road where desirable species are becoming established. Any mechanical disturbance of the road will rejuvenate halogeton germination.

To summarize, JBR feels that (1 while halogeton growth this year is luxuriant due to heavy precipitation, it has not deterred an increase in desirable species; (2 there is no effective means of eradicating halogeton; (3 the halogeton has not been poisonous to livestock or wildlife and (4 the normal plant succession, although slow, will replace and control the halogeton on the reclaimed site.

Sincerely;

Joseph M. Jarvis

Joseph M. Jarvis
JBR Consultants Group

cc: Lee Edmonson, CalMat
Karla Knoop, JBR