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

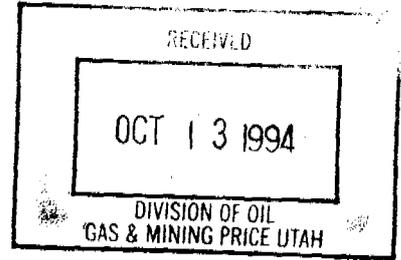
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Mobile Permit

(B)

September 21, 1994



TO: Darron Haddock, Permit Supervisor  
FROM: Susan M. White, Senior Reclamation Biologist *SMW*  
RE: Draft Review, Amendments Received 8/16, Hidden Valley Coal Company, Hidden Valley Mine, ACT/015/007, Working File, Emery County, Utah

SYNOPSIS

A letter from JBR Environmental Consultants, dated August 15, 1994 with permit amendments was received by the Division. This memo will review that letter and proposed amendments as they relate to the Biology portion of the State of Utah Coal Mining Rules.

ANALYSIS

The letter states:

*We feel that the primary focus on vegetation issues at this time should (be) in regard to the adequacy of the existing reference area.*

I also feel that the existing reference area is limited since it is only a transect line and not one acre in size as required in the Division's Vegetation Information Guidelines. JBR (Joe Jarvis and Karla Knoop) and I have discussed the possibility of other additional sites to be used as a vegetation standard. However, the vegetation data must be submitted as required in the Guidelines and at that time the Division will review the proposed standard.

I do not agree with the letter in that the primary focus on vegetation issues should be to establish a new vegetation standard. I think the primary focus at this time should be to establish a vegetative cover which is desirable and permanent and will fulfill the requirements of R645-301-350. I do not envision that additional reference areas will have a notable change in the revegetation standard.



At the on site meeting August 31, JBR and myself discussed various methods of meeting the R645-301-350 standards. We agreed that water harvesting techniques in combination with planting site collected seed could be a method with a high probability of success. We also discussed that on this site the probability of realizing seeding success in any one year is fairly low and that subsequent seedings maybe required. I also stated that if the operator chose not to seed then a demonstration should be made that the site was showing a positive trend toward meeting the R645-301-350 standards.

The proposed amendments are mostly related to hydrologic work on site. Proposed page 27-A concerning regrading or stabilizing rills and gullies may conflict with the Division's proposed R645-301-357.364 which states:

*The repair and/or treatment of rills and gullies which result from a deficient surface water control or grading plan, as defined by the recurrence of rills and gullies, will be considered an augmentative practice and will thus restart the extended responsibility period.*

Currently rill and gully repair is considered an augmentive practice. The operator should be advised on the implications of this type of commitment.

#### **RECOMMENDATION**

- \* No amendments have been submitted for vegetation work.
- \* The operator should be encouraged to evaluate the need to do augmentive vegetation work on site.
- \* Any proposed reference area information must be submitted as required by the Division's Vegetation Information Guidelines.
- \* The operator should be advised that the proposed amendment page 27A could be considered as an augmentive practice which may begin again the operator's responsibility period.

cc: Bill Malencik  
Joe Helfrich  
Tom Munson