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

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July 29, 1997

TO: File

THRU: Joe Helfrich, Permit Supervisor *JH*

FROM: Susan M. White, Senior Reclamation Biologist *SMW*

RE: Amendment to Reclamation Plan, Consolidation Coal Company, Hidden Valley Mine, ACT/015/007-97B, Emery County, Utah

SUMMARY:

The Operator submitted an amendment to the reclamation plan, date received June 26, 1997. The amendment proposes to recontour and resurface the "B" seam with a rock mulch to enhance vegetation establishment. No deficiencies were noted in the revegetation section of the amendment. The proposed change in the postmining land use from wildlife and cattle grazing to wildlife only should not be approved. It is suggested that the proposed change in land use be amended in a separate submittal.

TECHNICAL ANALYSIS:

RECLAMATION PLAN

POSTMINING LAND USES

Regulatory Reference: 30 CFR Sec. 784.15, 784.200, 785.16, 817.133; R645-301-412, -301-413, -301-414, -302-270, -302-271, -302-272, -302-273, -302-274, -302-275.

Analysis:

The stated postmining landuse is livestock grazing and wildlife habitat. This

amendment proposes to change the postmining land use to wildlife habitat only. Justification is that the site never has nor never will produce the type of forage generally recognized for a grazing land use. Nevertheless, grazing is a land use as evidenced by the presence of cattle during the winter months. The permit justifies leaving the road to the reclaimed audits for use as a livestock trail. The Division recognizes that the disturbed area perhaps may have never been used by livestock. The Division also recognizes that proper range management would not support livestock as a land use.

The application must provide additional information to determine that the premining land use was never livestock grazing based on land use and local classifications (R645-301-411.130). Or the Operator can propose an alternative postmining land uses under R645-301-413.300. The Division suggests that the postmining land use issue be removed from this application and addressed in a separate submittal.

Findings:

Information found in the amendment does not meet the minimum regulatory requirements of this section. Prior to approval, the permittee must provide the following in accordance with:

R645-301-412, the application is unclear if the proposed land use change is due to improper designation of the land use in the original permit or if the Operator is proposing a change in the postmining land use. In either case additional supporting information concerning actual land use is required.

REVEGETATION

Regulatory Reference: 30 CFR Sec. 785.18, 817.111, 817.113, 817.114, 817.116; R645-301-244, -301-353, -301-354, -301-355, -301-356, -302-280, -302-281, -302-282, -302-283, -302-284.

Analysis:

General Requirements

The operator has committed to reaffected portions of the 6.7 acres of disturbance which was unsuccessfully revegetated. This decision has been made based on several studies of the area seeded in 1986 and again in 1989. Seven years after the last seeding efforts many areas

are meeting less than 50 percent of the revegetation success standard. The proposed work for fall 1997 is to rework the surface of the "B" seam adit slope.

The "B" seam adit slope will be shortened and thus steepened allowing a flatter area between the slope and Ivey Creek. A coarse fragment rock cover mulch will then be applied to the surface 12 inches. The coarse fragment will be obtained on site, possibly from the base of the old road. The coarse fragment surface will provide a very roughen surface for water catchment. The Operator and Division have discussed extensively in the field the importance of this roughen condition. The Division highly recommends the use of any methods which creates the greatest surface roughness.

The seed mixture is outline in Section B, page 3. The mixture is comprised of species adapted to the site and many which could be found in areas adjacent to the site. Several species are proposed for hand collection on site. Seed will be spread by broadcast seeding methods (Section B). After application, the seed will be incorporated to the extent possible by hand raking.

Timing

The plan commits to seeding in early fall. Fall through mid winter is an acceptable seeding period for this area.

Mulching and Other Soil Stabilizing Practices

The plan proposes to use a rock mulch for moisture retention and soil stabilization. The Division recommends that in addition to the rock mulch the operator use alfalfa hay at the rate of 2 tons per acre, shredded, as a soil stabilizer and soil conditioner. The hay may not attract elk if the alfalfa is spread by a blower which should pulverize the hay. The hay could then be worked into the surface while surface roughening.

Standards for Success

The success standard is unchanged by this submittal. The reaffected portion of the site will be subject to a new period of extended responsibility.

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Findings:

Information found in the plan meets the minimum regulatory requirements of this section.

RECOMMENDATION:

Prior to approval the requirements of R645-301-412 must be provided as outlined above.

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