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STATE OF UTAH
NATURAL RESOURCES
Oil, Gas & Mining

Scott M. Matheson, Governor
Temple A. Reynolds, Executive Director
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4241 State Office Building • Salt Lake City, UT 84114 • 801-533-5771

November 2, 1984

Office of Surface Mining
Western Technical Center
Brooks Towers
1020 Fifteenth Street
Denver, Colorado 80202

Attention: Mr. Lou Hamm

Gentlemen:

RE: Deficiencies in the Mining and Reclamation Plan, Diamond
Shamrock Coal Unit, Trail Mountain Mine, ACT/015/009, #2,
Emery County, Utah

The Division review of the final version of the Trail Mountain Mine Permit Package now in Washington, D. C., indicated there are outstanding deficiencies in the Mining and Reclamation Plan (MRP) that need to be addressed. The revegetation success standards were noted previously in a letter to Allen Klein from Dianne R. Nielson dated May 14, 1984.

The deficiencies are attached on the following pages and include regulations: UMC 783.15, 784.14, 784.23, 817.100 and 817.116-.117.

If you have any questions or comment, please call me.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Ronald W. Daniels'.

Ronald W. Daniels
Acting Administrator
Mineral Resource Development
and Reclamation Program

PGL/btb
Enclosures
cc: Dianne Nielson
Steve Cox
Pam Grubaugh-Littig
Rick Smith
88080-45

DEFICIENCIES

Natomas Coal Company
Trail Mountain Mine
ACT/015/009, Emery County, Utah

November 2, 1984

UMC 783.15 Ground Water Information and UMC 784.14 Protection of Hydrologic Balance

The Division regards information given in the Trail Mountain Mining and Reclamation Plan (MRP) to be inadequate for the purpose of characterizing the Star Point-Blackhawk aquifer system within and adjacent to the mine plan area (UMC 783.15[1], [2]). The MRP should contain a proposal and commitment to collect and analyze borehole data with particular emphasis towards delineating and monitoring the aforementioned aquifer system. Acquisition and analyses of these data will allow a more accurate assessment of the probable hydrologic consequences of mining as per UMC 784.14.

UMC 784.23 Operation Plan: Maps and Plans

(9) The applicant must have each explosive storage and handling facility indicated on maps. This facility needs to be shown on Figure 3-1, Surface Facilities Map.

UMC 817.100 Contemporaneous Reclamation

This regulation is not addressed in the Technical Analysis.

UMC 817.116-.117 Revegetation: Standards of Success and Tree and Shrub Stocking

The Technical Analysis (TA), Section UMC 817.116 states that the criteria for successful revegetation will be replacement of cover, productivity and density of woody species to within 70 percent of that found on the reference areas with 90 percent confidence. This is incorrect.

Since the area is to be returned to a postmining land-use of wildlife habitat, UMC 817.116(b)(3)(iv) applies. It states that success of vegetation shall be determined on the basis of tree, shrub, half-shrub stocking and ground cover. Productivity is not to be used as a standard.

Cover shall be considered acceptable if it is at least 70 percent of the ground cover of the reference areas with 90 percent statistical confidence or if the ground cover is determined to be adequate to control erosion by the Division.

Stocking rate (UMC 817.117[c]) of live woody plants shall be equal to or greater than 90 percent of the stocking of woody plants of the same life form on the reference area. When this requirement is met and acceptable ground cover is achieved, the 5 or 10 year responsibility period required in Section UMC 817.116(b) shall begin. Upon bond release, woody plant density must be equal to or greater than 90 percent stocking rate of the reference area with 80 percent statistical confidence (UMC 817.117[c][3][i]).

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