



United States Department of the Interior
 OFFICE OF SURFACE MINING
 Reclamation and Enforcement
 BROOKS TOWERS
 1020 15TH STREET
 DENVER, COLORADO 80202

OFFICE OF THE REGIONAL DIRECTOR

DEC 5 1980

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DEC 10 1980

DIVISION OF
 OIL, GAS & MINING

Mr. James W. Smith Jr.
 Coordinator of Mined Land Reclamation
 Division of Oil, Gas and Mining
 1588 West North Temple
 Salt Lake City, Utah 84116

Dear Jim:

By letter of August 11, 1980, Mr. Leland Spencer, of your staff, requested our review and comment on Consolidation Coal Company's waste disposal plan for the Emery Mine. My staff has reviewed this plan and has found that more information is required before our analysis can continue. Mr. John Nadolski of my staff, contacted Mr. Bill Dunn and Ms. Mary Jo B. Ormiston of Consolidation Coal by telephone on November 21, 1980 to relay OSM's concerns and to discuss Consolidation Coal Company's need for action on this plan. Based upon this conversation, it is suggested that Consolidation integrate its response to our deficiencies into their revised mine and reclamation plan that is now being prepared. The technical deficiencies are listed below. As we proceed with our technical review, we may find that more information is required.

Soils

1. A soil survey must be provided including the following:

- a. Map delineating soil types.
- b. Mapping unit descriptions including inclusions, if any.
- c. Soil description of typical profile within disturbed area.
- d. Analytical data of major soils including the following at a minimum:

1. pH
2. EC
3. SAR
4. Soluble Ca, Mg and Na
5. Saturation percentage
6. Mechanical analysis (% sand, silt and clay)

2. Amount of suitable topsoil should be provided with intended replacement depth.

3. The proposal states that the material excavated from the pits will be stockpiled and replaced to a depth of four feet over the refuse material. If this material is to be within the root zone of plants, the analysis in 1. d. (above) must be performed.

4. How will these stockpiles be stabilized to prevent wind and water erosion? If stabilization is to be achieved by vegetative cover, a seed mix must be provided.

Revegetation

It is stated in the proposal that the native vegetation will be reestablished. The following information must be provided:

1. Vegetative communities, within the proposed disturbance, must be identified. At a minimum the following must be provided:
 - a. Cover by species;
 - b. Production by life form (these must be adequately sampled);
 - c. Woody plant densities.

This information should also be supplied for the reference area(s). The reference area(s) are necessary in order to evaluate the success of revegetation.

A reclamation plan for all disturbed areas is necessary. Also, the feasibility of reclamation should be demonstrated.

If you have any questions in regard to this review, contact John Nadolski (303) 837-3773 of my staff.

Sincerely,



DONALD A. CRANE

cc: Moffitt, USGS, SLC