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DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER
Executive Director

Division of Oil, Gas and Mining

JOHN R. BAZA
Division Director

Outgoing
C0150015
#3889
OK

October 6, 2011

John A. Gefferth, Environmental Engineer
Consolidation Coal Company
P.O. Box 566
Sesser, Illinois 62884

Subject: Reclamation Commitments, Consol Energy Company, Emery Deep Mine,
C/015/0015, Task #3889

Dear Mr. Gefferth:

During the Emery Deep mine's annual report review process, a commitment was identified that needed to be addressed. The commitment discusses the development of an investigative study into past reclamation practices conducted at the Emery Deep and Hidden Valley Mines. The following is the commitment as found on page 4a of Chapter 3 of the MRP.

The permittee is committed to develop an investigative study into past reclamation practices conducted at the Emery and Hidden Valley mine sites. The scope of the investigation shall include but not limited to:

- 1. Evaluate current vegetation and soil chemistry of all topsoil and subsoil stockpiles. Past reclamation sites of disturbed land are to be included within the scope of study. "A Reclamation Monitoring Study for the Emery Mine- Vegetation and Soils" was completed in 2003 and can be found in ChIII Appendix III-1.*
- 2. Based on findings from the study, plans shall be developed to enhance the vegetation of each site. The plan is to be reviewed with Division of Oil, Gas and Mining (DOG M) prior to implementation of the plan. Period for implementing enhancement methods should be performed when warm season planting may be conducted.*
- 3. The qualitative part of the study will be performed annually and the quantitative aspects be performed between the 4th and 6th year, following initial implementation of enhancement methods. The present reclamation methods shall be correlated with the historical weather information obtained from on-site weather station.*
- 4. Based on the follow-up study, a total reclamation plan shall be developed for the Emery mine site. The plan is to incorporate and utilize the best reclamation practices found through the previous investigative studies. The final reclamation plan will be developed in conjunction with DOGM and submitted 12 months prior to initiating final reclamation.*



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Division of Oil, Gas and Mining (the Division) staff members have reviewed the commitment and conducted a technical analysis of the relevant information currently in the approved Mining and Reclamation Plan (MRP). Based on the technical analysis, the Division has identified several deficiencies that must be addressed (See Attached) in order to satisfy the commitment.

It is my understanding that an on-site visit has been scheduled on October 12, 2011 with Division and Emery Deep representatives to discuss the aspects of the commitment and determine the best way forward.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Christensen", with a long horizontal flourish extending to the right.

Steve Christensen
Permit Supervisor

SKC/sqs
cc: Price Field Office
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Deficiency List
Task No. #3889
Emery Reclamation Commitment

The members of the review team include the following individuals:

Priscilla Burton (PB)

Joe Helfrich (JH)

R645-301-130, The "Reclamation Monitoring Report" does not include results for sites 20, 21, and 22. The "Reclamation Monitoring for the Emery Mine, Soils" report is missing soil description forms and Table 2 is incomplete and does not include evaluations for each of the 22 sampling sites as described on page 2 of the Soils report. (PB)

R645-301-240, The following recommendations should be considered in formulating reclamation plans as described in item 2, page 4a of Chapter III of the MRP: Stockpiles should be graded to gentle slopes (4h:1v) and have only shallow roughening, such as ripping on the contour, to allow water infiltration but to avoid water impoundment; All sites should have 1 T/ac barley straw incorporated with ripping; Saline-sodic sites should have sulfur incorporated into the surface to lower the pH and induce dissolution of the lime reportedly present in the soil; Seed mix should contain only salt tolerant species; The seeded soil surface should be partially covered with a layer of woodstraw or gravel mulch to limit evaporation from the soil surface; and finally subsoil and topsoil stockpiles should be fenced to keep out livestock. (PB)

R645-301-340, Commitments 2, 3 and 4 noted in the scope of the investigation will need to include timelines for implementation. Additional recommendations for commitment #2 include:

A site visit with the permittee to visit the 22 study areas and discuss the results of the vegetation and soils investigations prepared by Mt. Nebo Scientific.

The addition of salt tolerant legumes and other salt tolerant plant species to the final reclamation seed mix based on the site visit and survey discussion.

A timeline for the submittal of plans should be established during the on site meeting.

The requirement in commitment # 4 to submit the reclamation plan 12 months prior to final reclamation should be deleted. (JH)