

December 3, 1987

TO: Memo to File

FROM: James S. Leatherwood, Reclamation Soils Specialist 

RE: New Ventilation Portal; Determination of Completeness and Technical Analysis, Convulsion Canyon Mine, Southern Utah Fuel Company, ACT/041/602-87B, Sevier County, Utah

The above-mentioned plan, submitted on November 25, 1987, has been reviewed and found not to be complete. The operator's request for a topsoil removal variance is not acceptable at this time. Further soil characterization is required for the removal variance and reclamation plan determination.

Determination of Completeness

UMC 783.21 Soil Resources Information - JSL

The soil survey, found in Volume 5 of the approved PAP, identifies the proposed disturbance soil as soil U. Soil U is identified as a Fine-loamy, mixed, Typic Cryochrept with 40% unit H, 20% unit O, and 15% rock outcrop. Due to the large variation of soils in this complex, it is difficult to characterize the soil at the specific proposed disturbance area. The native soil should be identified as only one of the soil types (i.e., U, H, O or Rock Outcrop).

The native soil must be fully characterized. In addition to the chemical analysis submitted in Exhibit 11, the following parameters must be determined: alkalinity, calcium carbonate percent, total nitrogen, available phosphorus, percent rock fragments, and saturation percentage. Other required information includes a soil horizon description (i.e., depth, structure, color, percent root fragments, etc.), soil depth, and slope.

Page 2
Memo to File
ACT/041/602-87B

UMC 784.13 Reclamation Plan: General Requirements
- JSL

The operator's request for a topsoil removal variance is not acceptable at this time. The November 25, 1987 submittal does not contain an adequate soil survey to determine this variance. In accordance with UMC 817.22(g) an exception to topsoil and subsoil may be granted if the operator can show that: A) Removal is impractical or unsafe, due to steep slope or adverse terrain or because of shallow soils (less than six inches) or because of rockiness; and B) The substitute soils will meet the requirements of UMC 817.22(a) regarding substitute soils. The plan must provide evidence indicating that revegetation standards will be achieved with any substitute soil.

jr
cc: S. Linner
K. Wheeler
1342R/12:13