



# State of Utah

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TO: Daron Haddock, Permit Supervisor

FROM: Paul Baker, Reclamation Biologist 

DATE: December 13, 1991

RE: Interim Revegetation at Southern Utah Fuels Company, Convulsion Canyon Mine, Folder #2, ACT/041/002, Sevier County, Utah

Southern Utah Fuels (SUFCO) has nearly completed its new substation; they are now working to wire it. Surface disturbances are complete, and the area has been seeded.

The area which was disturbed consists of a strip about five feet wide around the base of the binwalls, and the area between the substation and the stock trail. The slope is about 60%. This area was broadcast seeded in late October or early November, and the seed was raked into the surface. There was no scarification or mulching performed, and the slope is fairly smooth.

SUFCO's plan for interim revegetation is ambiguous on whether mulching and scarification techniques are to be used. The regulations require mulching and other soil stabilizing practices to be used on areas that have been regraded and had soil applied. This area doesn't technically fit that requirement. Other regulations requiring erosion and sediment control through use of best technology currently available could probably be cited for this situation; however, after discussing the situation with Joe Helfrich, we decided that an alternative to enforcement action should be used.

I believe that there is little chance for revegetation success on this hillside. Similar areas on the minesite have been seeded three times and are still not vegetated to limit erosion as well as I feel could be accomplished by different techniques. It is particularly important to revegetate this area since runoff doesn't report to the sediment pond.

Mulching alone may not be enough to slow runoff and increase water infiltration and availability to the seeds. Since seeding has already been done, however, I feel that the best alternative is to mulch now while the ground is not completely frozen with two tons per acre of straw or hay and to anchor it by hand using shovels. Operators are traditionally given two years before remedial action is required on revegetated sites, but I believe that past failures and professional judgment justify evaluating the need for corrective actions earlier. If this year's seeding effort doesn't show clear signs of being successful by next fall, the area should be scarified by gouging, terracing, or some other method, reseeded, and mulched.