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# State of Utah

DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF OIL, GAS AND MINING

Norman H. Bangert  
Governor  
Dee C. Hansen  
Executive Director  
Dianne R. Nielson, Ph.D.  
Division Director

355 West North Temple  
3 Triad Center, Suite 350  
Salt Lake City, Utah 84180-1203  
801-538-5340

October 21, 1992

Mr. Ken Payne, Manager  
Southern Utah Fuel Company  
P. O. Box P  
Salina, Utah 84654

Dear Mr. Payne:

Re: Approval of New Revegetation Methods, Coastal States Energy Company, Southern Utah Fuel Company, Convulsion Canyon Mine, ACT/041/002, Folder #3, Sevier County, Utah

The Division has reviewed the revegetation portion of your submittal received on October 13, 1992 intended to satisfy Division Order 92A (renewal deficiencies). The revegetation plan is considered adequate and is hereby approved with the condition that you specify the type of mulch to be used for the waste rock disposal site. Please refer to the enclosed technical memo written by Paul Baker. This approval includes authorization to use the methods on revised pages 4-3 and 4-4 as proposed on October 24, 1992.

The review of the remaining portions of the renewal deficiency response is still ongoing and will be forwarded to you as soon as it is completed. You will be required to correct your plan to state the type of mulch to be used at that time along with any other corrections brought up at the conclusion of the review.

Thank you for your cooperation during the permitting process. Please call if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Daron R. Haddock".

Daron R. Haddock  
Permit Supervisor

Enclosure

cc: P. Baker  
S. Demczak  
REVEAPPR.SUF



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TO: Daron Haddock, Permit Supervisor

FROM: Paul Baker, Reclamation Biologist 

DATE: October 20, 1992

RE: SUFCO Response to Rock Waste Revegetation Plan Technical Deficiency Review, Southern Utah Fuel Company, Convulsion Canyon Mine, Folder #2, ACT/041/002-DO92A, Sevier County, Utah

## SUMMARY

SUFCO submitted a response to the permit renewal technical deficiency review on October 13, 1992. They plan to seed an area of the rock waste disposal site on Saturday, October 24, 1992, using the methods discussed in this submittal rather than the methods in the current plan. This review is only of the revegetation plans for that site.

## ANALYSIS

**R645-301-341**

### Revegetation Plan

#### Proposal:

The proposed plan states that seed will be drilled where possible and broadcast as necessary on steep slopes or for touch-up effort. The next paragraph states that seed will be drilled, broadcast, or hydroseeded and treated with mulch on flat areas. On slopes, appropriate broadcast or hydroseeding methods will be used.

Mulch will be held in place using a tackifier, or well-anchored matting may be used as an alternative. Mulch will be applied at the rate of 2000 lbs. per acre.

#### Analysis:

The seeding and mulching methods proposed are not those that are recommended as being the most successful, but, assuming that the mulching material to be used is a wood fiber hydromulch, they can be approved. I have been told that the area to be seeded has been roughened, and this is probably more important than

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seeding and mulching methods in increasing the chances for success.

R645-301-341.230 requires that the type of mulch and rate of application be specified in the plan. The plan does not specify what type of mulch is to be used, but it is probably safe to assume that SUFCO plans to use a wood fiber hydromulch this Saturday.

**Deficiencies:**

1. The plan must specify the type of mulch that is to be used for the rock waste disposal site.

**RECOMMENDATIONS**

Approval of the changes on pages 4-3 and 4-4 of the rock waste disposal volume is recommended except that the type of mulch needs to be specified. Because SUFCO plans to seed using the methods shown on these pages on Saturday, October 24, they would like to receive approval to use these methods before that time.