



State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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TO: File

THROUGH: Daron Haddock, Permit Supervisor

FROM: Paul Baker, Reclamation Biologist

DATE: July 21, 1993

RE: Third Response to Permit Renewal Technical Deficiency Review,
Southern Utah Fuel Company, Convulsion Canyon Mine, Folder #2,
ACT/041/002

SUMMARY AND RECOMMENDATIONS

On July 15, 1993, the Division received a response to deficiencies that still remained after the second submittal intended to address deficiencies raised at permit renewal. Three deficiencies remained. Two of these have been adequately addressed, and the third deals with the requirements for a variance from approximate original contour and does not need to be addressed at this time. These changes to the plan should be approved.

ANALYSIS

R645-301-341

Revegetation

Deficiency:

1. The revegetation plan for the waste rock disposal area needs to state what type of mulch will be used.

Response and Analysis:

Wood fiber or crimped straw may be used as mulch at the waste rock site. Well-anchored matting may be used as an alternative.

Remaining Deficiencies:

None.



R645-301-341.250 Success Determination Measures

Deficiency:

1. The plan needs to include the woody species density standard for success for the mine portal area of 1000 woody plants per acre that was established in consultation with and approved by the Division of Wildlife Resources.

Response and Analysis:

The required woody species density standard for success has been included in the plan.

Remaining Deficiencies:

None.

R645-301-412 Reclamation Plan

Deficiency:

1. The plan must adequately address appropriate sections of R645-302-270 for the variance from approximate original contour requirements. Additionally, the Division needs to include the requirements of R645-302-270 as a specific condition of the permit and to comply with other parts of R645-302-272 through 275.

Response and Analysis:

This deficiency was discussed in a meeting with Wess Sorensen on June 24, 1993. The plan deals with some of the requirements for a variance from approximate original contour (AOC) but does not address all of them. However, a variance may not be needed since it may be possible to demonstrate that the site will be returned to AOC using current plans. This issue needs to be revisited in the future but does not need to be addressed now.

Remaining Deficiencies:

None.