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State of Utah

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March 2, 1998

TO: File

THRU: Daron Haddock, Permit Supervisor *NOQ #*

FROM: Robert Davidson, Soils Reclamation Specialist *RAD*

RE: Administrative Completeness Review - Link Canyon & Box Canyon Amendment, Canyon Fuel Company, LLC, SUFCO Mine, ACT/041/002-98A, Folder #2, Emery County, Utah

SYNOPSIS

Canyon Fuel Company, LLC, has submitted an amendment on January 22, 1998 for constructing a portal and substation in Link Canyon. This document supplies the Administrative Completeness Review for soils, Section R645-301-200.

TECHNICAL ANALYSIS

Directions: The categories listed below correspond to the minimum requirements for information necessary to initiate processing and public review. If a category is checked the Applicant has met the Completeness requirement for that category. If a category is not checked, the Completeness requirements have not been met. The comments column will identify the deficiency and what is necessary to correct it.

		Comments
301-200	Soils	— Incomplete. A generalized Order-2 soil survey was used for soil resource information. No soils map with pit locations provided. No topsoil will be salvaged. The Order-2 survey is provided in Appendix 2-2.
211	Description of Premining Soil Resources	— An Order-1 soil survey is required to accurately describe the soil resource and assess the 0.14 acre area for soil salvage.

212	Soil Resource Protection measures	<p>—</p> <ul style="list-style-type: none"> - None is provided. The amendment states that no soil resource will be protected because of boulders. The Order-2 soil survey shows no boulders in the soil description, only cobbles and stones. - Soil protection measures need to be evaluated using an Order-1 soil survey.
221	Prime Farmland Investigation	<p>—</p> <p>A Prime Farmland Investigation and determination needs to be provide by the NRCS.</p>
222	Soil Survey	<p>—</p> <ul style="list-style-type: none"> - An Order-1 soil survey is required for the 0.14 acre disturbance site. - The Order-1 soil survey will meet the standards of the National Cooperative Soil Survey. - The Order-1 soil survey will be performed by a certified soil scientist. - An appropriate soil map delineating the different soils is needed and scaled to meet the standards of the National Cooperative Soil Survey. - Soil identification and descriptions are needed base on the Order-1 soil survey and must meet the standards of the National Cooperative Soil Survey.
224	Substitute Topsoil Info (When Proposed)	<p>—</p> <p>- None proposed.</p>
230	Operation Plan: Topsoil Handling/Removal/Storage	<p>—</p> <ul style="list-style-type: none"> - Based on the Order-1 soil survey, soil resource protection needs to be provided. - Describe the methods for removing and storing topsoil, subsoil, and other materials. - Provide testing plan for evaluating topsoil handling and reclamation procedures related to revegetation. - Describe the construction, use, and maintenance of soil handling and storage areas. - If topsoil is not salvaged, substitute topsoil information is required to provide a suitable growth medium for reclamation efforts. This will include, but not be limited to importing soil materials of the quality and quantity to achieve reclamation.

240	Reclamation Plan: Soil Redistribution/Stabilization	- The amendment needs to include plans for soil redistribution, use of soil nutrients and amendments, and stabilization practices.
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RECOMMENDATIONS

Provide soil resource information based on an Order-1 soil survey with soil pits located within the immediate disturbed area boundary. An Order-1 survey will then provide specific information to the site which is necessary to assess soil salvage. Please note that the Order-2 soil survey was not specific to the proposed disturbed area, with no soil pits located in the immediate disturbed area. Therefore, only subjective conclusions can be raised for soil salvage. The main objection raised for soil salvage was boulders, whereas the Order-2 soil survey only accounts for cobbles and stones within the surface soils.

If the area provides suitable soil material for cut and fill when constructing the portal pad, then suitable material most likely exists for salvaging soils. Rock material, particularly cobbles and stones, are desirable for salvaging and storing with the soil resources. What exists before disturbance and supports vegetation in this environment will be needed at reclamation to re-establish vegetation. Rock material is actually beneficial for these arid soils for water harvesting, soil stabilization, and plant establishment. The rock helps provide micro-climates for plant establishment.

If no topsoil is salvaged, then the operator is required to import soil material of the quality and quantity necessary to achieve revegetation standards. This will require permitting a borrow site for future reclamation efforts.