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# TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

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November 2, 2011

TO: Internal File

THRU: April Abate, Team Lead *AAA 11-8-2011*

FROM: Priscilla Burton, Environmental Scientist III/Soils. *PWB my SOS*

RE: West Lease Bore Hole Drilling Activities, Canyon Fuel Company, LLC., SUFCO Mine, C/041/0002, Task #3942

## SUMMARY:

The application was received on October 24, 2011. The application does not provide any soils information. There is no information available on the NRCS soil web survey for this location. The work will entail foot access and hand tool disturbance to soils in a total area of 0.012 acres. The following addition to the plan is requested to support the finding of minimal surface disturbance, with no disturbance to vegetation and no soil erosion.

R645-301-232.400, Please provide a commitment in the plan to 1) provide the following photographic documentation for each drill site: before disturbance, during the drilling operation, and upon reclamation and 2) provide the aspect and slope of each drill site and 3) inspect and photograph each reclaimed drill site during the 2012 field season to check for erosion.

**TECHNICAL MEMO**

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**TECHNICAL ANALYSIS:**

**OPERATION PLAN**

**TOPSOIL AND SUBSOIL**

Regulatory Reference: 30 CFR Sec. 817.22; R645-301-230.

**Analysis:**

**Topsoil Removal and Storage**

The application states that the sites will be accessed on foot and there will be minimal earth excavation using hand tools to prepare level surfaces for the drill platform, water tanks, mud-tanks and drill rod trays. The total disturbed acreage for the four drill sites is expected to be 0.012 acres.

The elevation is approximately 8,400 ft. The application states that proposed drill hole locations are generally in grass and low sagebrush areas, however the slope of the 4 drill sites appears to be similar to the 66% slope indicated west of the portal yard on Exhibit #2. The slope cannot be calculated, since the scale is not indicated on Exhibit #2. Soil depth was not indicated. The location is not included in the NRCS soil web survey inventory area and no soils information is available on line. The application specifies immediate seeding of the disturbed area with a final reclamation seed mix.

This disturbance falls under R645-301-232.400, "The Division may not require the removal of topsoil for minor disturbances which:  
232.410. Occur at the site of small structures such as power poles, signs, or fence lines; or  
232.420. Will not destroy the existing vegetation and will not cause erosion.

**Findings:**

**R645-301-232.400**, Please provide a commitment in the plan to 1) provide the following photographic documentation for each drill site: before disturbance, during the drilling operation, and upon reclamation and 2) provide the aspect and slope of each drill site and 3) inspect and photograph each reclaimed drill site during the 2012 field season to check for erosion.

**RECOMMENDATIONS:**

A commitment in the plan is requested.