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February 20, 1987

TO: File

FROM: James Leatherwood *JL*

RE: Technical Analysis, Summit Minerals Reclamation Plan, Summit Minerals Inc., No. 1 Coal Mine, INA/043/001, Summit County, Utah

The above stated reclamation plan has been reviewed. The following concerns must be addressed prior to determining this plan technically adequate.

UMC 817.23 Soil: Storage - JSL

Page one (1) of the Reclamation Appendix discusses the contemporaneous reclamation of topsoil stockpiles. However no topsoil stockpiles exist at the mine area. Page one (1) of the Revegetation Appendix must be revised.

UMC 817.25 Soil: Nutrients and Soil Amendments - JSL

On page 783.21-5 the PAP refers to the Divisions suggestion to incorporate alfalfa into the soil. However, the operator does not commit to do such. The alfalfa must be incorporated into the soil during ripping and disk-harrowing of the in situ soil material. The addition of this material will meet the requirements for nitrogen fertilization and enhance the physio-chemical characteristics of the soil.

On page eight (8) of the Revegetation Appendix, the operator includes a mulch of native hay at the rate of 2000 lbs/ac. If the native hay contains 100 percent straw, an additional 70 lbs of nitrogen fertilizer must be applied to each acre. The nitrogen requirement would be reduced 17.5 lbs/ac for each 500 lbs of alfalfa contained in the native hay. The operator must commit to this fertilization plan to maintain the carbon nitrogen ratio.

UMC 817.102 Backfilling and Grading: covering Coal and Acid- and Toxic- Forming Material - JSL

The applicants proposal of three (3) feet of fill cover over the coal waste is not acceptable. The applicant must place four (4) feet of fill material over the coal waste.

cc. S. Linner
R. Harden
0534R-88