The Wellington Preparation Plant was completed and put into operation by U.S. Steel Corp. in 1958. The plant was in continuous operation until 1985 and sold to Kaiser Coal Company in 1986. Nevada Electric Investment Company (NEICO), a subsidiary of Nevada Power Company took joint ownership of the plant in 1989. NEICO is the current sole-owner and operator of the Wellington Preparation Plant.

The plant is located in Carbon County, Utah on portions of Sections 8, 9, 10, 15, 16 & 17, Township 15S, Range 11E, SLBM.

The plant was used in the past by U.S. Steel Corp. for cleaning, processing and loading coal. More recently NEICO has used the plant area for a coal handling and loading facility. The plant is presently idle with several plans being entertained for future operations at the site (see Sec. 5.21 & Sec. 5.26).
Premining Land-Use Information.

Records from previous owner, U.S. Steel Corp. [ORP p. 784-29 (Rev. 1:6-30-83)], and later determined by the 1984 State Permit Decision Package [see DOGM TA (2/9/96)] indicate that the predisturbance use of land that is currently occupied by the slurry pond and impoundments east of the Price River was "undeveloped land". The predisturbance use of the areas west of the Price River that is currently occupied by the railroad and processing plant facilities was also "undeveloped land" and "probably supported limited grazing" (from the same references mentioned above).

Land Capability

Records from previous owners from which the 1984 State Permit Decision Package was based, also commented on the capability of the predisturbed land. It stated that the soil descriptions for all disturbed areas indicated a minimal capability to support a higher use level and that the capacity of the reclaimed land to support a variety of alternative uses will be limited due to a lack of subirrigation water, lack of rainfall, and a desert environment.
Productivity of the major vegetation communities in the area of the Wellington Plant was clipped and measured in 1983 by Mt. Nebo Scientific and in 1995 estimated qualitatively by the Natural Resource Conservation Service (NRCS). A summary follows.

<table>
<thead>
<tr>
<th>Product Description</th>
<th>1983</th>
<th>1995</th>
</tr>
</thead>
<tbody>
<tr>
<td>Atriplex - Hilaria Community</td>
<td>239</td>
<td>500</td>
</tr>
<tr>
<td>Artemisia - Hilaria Community</td>
<td>161</td>
<td>---</td>
</tr>
<tr>
<td>Sarcobatus - Suaeda Community</td>
<td>729</td>
<td>750</td>
</tr>
</tbody>
</table>

Overall productivity of the area has been rated as "low" earlier by the NRCS (formerly the Soil Conservation Service).

Current Land Use

Current land uses have been described as industrial, pastureland/grazing (with some rotation optional areas) and undeveloped lands [Dwg. 3343(1)]. Much of the land that lies north and east of the facility area, between the railroad tracks and the Price River, is currently grazed pasturelands. There is also an area shown on the map [Dwg. 3343(1)] as "Pastureland/Grazing (Rotation Optional)". Cultivation and specific land use practices in this area changes from year to year. Flexibility is based primarily on the use and availability of irrigation waters. For example, when the fields are irrigated, crops i.e. corn, grass and alfalfa are grown. When
alfalfa is grown, it is sometimes harvested as hay, while other times it is used for standing pasture feed for domestic livestock. The water for irrigation relies on the somewhat marginal quality of water from the Price River.

Annual production of crops over 2 years (1991 & 1992) was estimated to be approximately 7,384 lbs/acre of alfalfa and 6,826 lbs/acre of corn.

The Carbon County Building Department (Price, UT) has stated that the area is zoned M&G-1, (Mining and Grazing). The following narrative summarizes the past and present uses of land zoned as such by the County (taken from the previous permit and as condensed from Section 4-2-15 M&G-1 Mining and Grazing Zone description, personal communication from the Carbon county Building Dept., June, 1990).

Because of limitations imposed by climate, topography, soil capability, inadequate water supply and the presence of economically significant mineral deposits, this area has historically been utilized as a place for the grazing of livestock on open range and as the location of numerous mining and mineral exploration sites. The particular characteristics and conditions present in this area make the land more appropriately suited for a continuation of these uses. However, because of the relatively fragile balance of nature in the area, all permitted activities must be carried out in a manner consistent with the limitations of the environment. These uses which are reasonably necessary to the use of the land for agriculture, mining and certain types of industrial operations shall be encouraged, provided that adequate guarantees for the protection of the area have been incorporated.

Among the permitted non-conditional uses are:

- minor utility transmission projects
- manmade lakes, reservoirs, ponds and dams under ten (10) acre-feet in capacity
- minor mines and pits, subject to the prior approval of a site plan as provided under Section 3-3-26
- caretaker dwellings subject to the provisions of Section 3-3-21
- Production wells

Among the permitted conditional uses are:

- major underground and surface mine developments, when approved by the County Commission and in accordance with the applicable provision of Chapter 5-4
- major utility transmission and railroad projects, when approved by the County Commission in accordance with the applicable provisions of 5-5
- industrial uses and activities when approved as a large scale industrial project and in accordance with the provisions of Chapter 5-3
  1. the storage, processing and loading of earth products and facilities relating thereto
  2. electric generating plants
- manmade lakes, reservoirs, ponds and dams over ten (10) acre-feet of capacity when approved by the County Commission.

Cultural and Historic Resources

The following had been submitted previously in the Wellington Plant's Mining & Reclamation Plan (7/15/90).

There are no known cultural or historic resources eligible for listing in the National Register of Historic Places in the immediate area of the Wellington Plant. There are no known archaeological sites in the immediate area and the permit application was found to be in compliance with the National Historic Preservation Act by the Utah State Historic and Preservation Office, December 6, 1982.
There are no public parks or cemeteries within one hundred (100) feet of the Wellington Plant permit area and there are no lands within the permit area that are within any units of the National System of Trails or the Wild and Scenic Rivers system or study rivers.

The State of Utah Division of Oil, Gas & Mining (DOGM) has reviewed these findings. DOGM agreed with the above statements. As noted in DOGM's technical analysis (2/12/96), an apparent completeness review was completed on December 6, 1982, which did not require any additional request for information, however, no document could be found from the records of the Utah Historic Preservation Office for the referenced date. Existing DOGM document records from the Utah Historic Preservation Office did include a letter dated September 24, 1981 which indicated the Division of State History was in agreement with the mine plant and "it is unlikely that there are any cultural sites in the area or any that would be affected by the development of the Wellington Preparation Plant". Additionally, a January 19, 1984 memorandum stated "the negative report submitted would appear to comply with any OSM regulation for cultural resource management". The technical analysis (2/12/96) further states that Wellington's MRP "was found to meet the requirements of this section in the State Decision Document on August 22, 1984". The approval was based on the Division of State History document dated September 24, 1981 and January 19, 1984.
Postmining Land Use Plan & Reclamation

Records from previous owner, U.S. Steel Corp. [p. 784-29 (Rev. 1:6-30-83)], and later determined by the 1984 State Permit Decision Package [see DOGM TA (2/9/96)] indicate that the predisturbance use of land that is currently occupied by the slurry pond and impoundments east of the Price River was "undeveloped land". The predisturbance use of the areas west of the Price River that is currently occupied by the railroad and processing plant facilities was also "undeveloped land" and "probably supported limited grazing" (from the same references mentioned above).

The postmining land use of all disturbed areas (including the topsoil borrow areas) following final reclamation will remain consistent with the premining land use which is "undeveloped" with "limited grazing" (unless, as discussed previously, some areas are changed in the future to an "Industrial" postmining land use). This has been approved by the State in the 1984 State Permit Decision Package [see DOGM TA (2/9/96)].

For more information about premining, current and postmining land use, refer to Section 4.11 of this document.
413.100 Postmining Land Use.

All disturbed areas will be restored in a timely manner to a condition able of supporting the uses they were capable of supporting prior to the mining operation, and/or to a state capable of better usage or those described in Section 4.12.
All operations at the Wellington Coal Preparation Plant will be conducted in compliance with the requirements of the Clean Air Act (42 U.S.C. Sec. 7410 et seq.) and any other applicable state and federal statutes and regulations containing air quality standards.

Past operations at the Wellington site performed activities under an approval order (AO) from the State of Utah, Department of Environmental Quality, Division of Air Quality (DEQ). The AO contained all pertinent information and descriptions necessary to be in compliance with the applicable regulations including operator addresses, coal stockpile information, equipment utilized, operational procedures, etc.

Notification of a company change from Castle Valley Resources to Earthco was approved by DEQ in the past. The AO dated DAQE-997-92, October 28, 1992, superseded AO DAQE-899-89, dated December 29, 1989, which superseded DAQE-762-89, dated November, 1989. Later, although the AO dated DAQE-997-92, October 28, 1992, showed Genwal Coal Company as the contact name, the approval letter from DEQ (dated April 3, 1997) reflected the name change. Therefore, at that time DEQ considered DAQE-997-92 (October 28, 1992) along with letter (April 3, 1997) the most current records for the AO.

Fugitive dust from current operations is minimized with the use of paved roads and water sprays on unpaved roads, reclamation areas and pad sites. For the current operations at the Wellington site, PRT has been working with DEQ regarding air quality and the applicable permits required.

The onsite fines removal activities will have a production rate of less than 1,000,000 tons per year. It has also been determined that the annual PM10 emissions will be below the five tons per year and therefore the operations will not require an approval order. Consequently, AO DAQE-997-92 is no longer active and does not apply to the Wellington property. Any reference to this AO should be removed from the text of the Mining & Reclamation Plan (MRP). That said, PRT has submitted a small source exemption registration form to the Utah Division of Air Quality.

If it is anticipated that the fines removal operations could exceed 1,000,000 tons per year in the future, PRT will submit an air pollution control plan and address applicable state regulations.