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cc L. Braxton



United States Department of the Interior
OFFICE OF SURFACE MINING
Reclamation and Enforcement
BROOKS TOWERS
1020 15TH STREET
DENVER, COLORADO 80202

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DIVISION OF
OIL, GAS & MINING

NOV 14 1986

Dr. Dianne Nielson, Director
Utah Division of Oil, Gas and Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

Dear Dr. Nielson:

The Office of Surface Mining Reclamation and Enforcement, Western Field Operations (OSMRE) has reviewed the October 2, 1986, Utah Division of Oil, Gas and Mining (DOGGM) letter and enclosed materials pertaining to Conditions No. 5 and No. 6 of the Belina Complex mine permit.

OSMRE does not concur with Utah DOGGM that Conditions No. 5 and No. 6 are satisfactorily addressed. Although the data and information that were submitted by the permittee indicate that the fill materials are suitable for use as substitute topsoil materials, the requirements of the two conditions have not been satisfied.

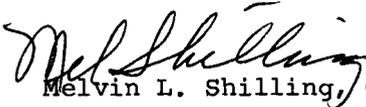
Condition 5 requires a plan for redistributing the substitute topsoil materials. The data and information that were submitted did not include any redistribution plan.

Condition 6 requires field trials (or greenhouse studies, which subsequently have been determined by the permittee to be infeasible) to determine the specific revegetation methods that will be necessary to achieve final reclamation success. The data and information provided by the permittee indicated good cover and productivity in the sampling areas; however, the seed mix was for temporary revegetation and consisted predominantly of introduced species, not the species that would be used for final reclamation. In addition, it is our understanding that the sampling sites were fertilized during the Fall previous to the sampling period.

While redisturbance of temporarily revegetated areas may be necessary, OSMRE maintains that appropriate field trials using the final reclamation seed mixes are necessary and should be designed and implemented as soon as possible.

If you have any questions, please contact Richard Holbrook or Mark Humphrey at (303) 844-2451.

Sincerely,


Melvin L. Shilling, Chief
Division of Federal Programs
Western Field Operations

cc: R. Hagen, AFO