



# State of Utah

DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF OIL, GAS AND MINING

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January 26, 1993

Mr. Steven K, Tanner, Environmental Coordinator  
Valley Camp of Utah, Inc.  
Scofield Route  
Helper, Utah 84526

Dear Mr. Tanner:

Re: Mid Term Review, Valley Camp of Utah, Inc., Belina Complex, ACT/007/001, Folder #3, Carbon County, Utah

This letter is written in response to your letter dated January 7, 1993, in which you expressed concern over way the Belina Mine plan was being reviewed. As you are aware, the Division is mandated by regulation R645-303-200 to review each permit during the term of the permit. The extent of that review appears to be the issue in question.

I would agree with you that there is a clear distinction between a new Permit Application Package and an "approved Mining and Reclamation Plan." Certainly a new application would require a more detailed review particularly since findings for permit approval would have to be made. Once a permit is issued it carries with it the right of successive renewal (see R645-303-230). Reviews should focus on any changes that have occurred since the original permit was issued not on past history.

If during the course of mining the content of the permit has changed, regardless of what caused the change, the Division must evaluate the change and act accordingly. For example, take your Probable Hydrologic Consequences (PHC) section. This would have been provided and evaluated during the initial application and a CHIA written. If mining activities or findings made by other agencies render the original PHC inaccurate, these changes would need to be evaluated and appropriate findings made. Perhaps additional information would need to be collected or a change in mining may be necessary. A revised CHIA would probably need to be written.

In short, the Division views Mining and Reclamation Plans as dynamic documents subject to change at about any time. Our reviews of approved MRPs should focus on any changes that have occurred. Information that has remained static, should not need to be reviewed again.

I hope this discussion has addressed your concerns about the permit review process. Please call if you have further concerns or questions.

Sincerely,

Daron R. Haddock  
Permit Supervisor

cc: L. Braxton  
B-Team  
LETTTOST.BEL