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STATE OF UTAH
NATURAL RESOURCES
Oil, Gas & MiningACT 1007/006
#2Scott M. Matheson, Governor
Temple A. Reynolds, Executive Director
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June 13, 1984

TO: Technical Review Staff, Plateau Mining Company's - Unit
Train Loadout, Utah Fuel Company's - Scofield Rock Waste
Disposal Site

FROM: D. Wayne Hedberg, *DWH* Permit Supervisor/Reclamation Hydrologist

RE: Development of Findings Documentation to Support Permit
Decision(s)

It has recently been brought to my attention (June 12, 1984) that the OSM is now requiring a findings document to accompany and justify the Division's decision on "significant" MRP revisions (those not requiring Secretarial sign-off). This requirement will be applicable to both of the revisions which we have been trying to get permitted (as referenced above).

Consequently, I must ask for your assistance in helping me draft this documentation. In order to make a positive findings for the proposals, it is necessary to identify, by discipline, those sections which present a change(s) in the mining and reclamation plan of operations and/or any environmental impacts, that differ from those as originally anticipated and presented in the findings and supporting documentation of the permanent MRP approval package.

I have been informed that this does not need to be an explicitly detailed document (i.e., not as involved as a major MRP approval findings section). For those sections which do not represent a change, a cross reference to the section in the approved MRP should be made. This does not require a comparison regulation by regulation, only by overall discipline. A brief summary of the changes with supporting explanation is supposedly all that will be necessary. A discussion of any substantial problems or concerns and how these were/or will be resolved should also be discussed.

I don't appreciate this extra exercise in creative writing any more than you do, but our program apparently requires that this documentation be developed for these types of revisions.

Dianne has indicated to me that these revisions will receive priority status until they are complete (because of previous Division/operator communications and company contract commitments).

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Memorandum - Technical Review Staff
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OSM must provide written concurrence with our findings and recommendations for approval before the Division notifies the operators of final approval to commence construction (for federal mines).

Should you have questions, please contact me. Thank you for your assistance in these matters. Please see me to obtain a copy of the original Technical Analyses for the mines.

DWH/btb
cc: Dianne Nielson
Ron Daniels
Jim Smith
Joe Helfrich
89460-11 & 12