



State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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October 7, 1992

TO: Pamela Grubaugh-Littig, Permit Supervisor ✓

FROM: Henry Sauer, Senior Reclamation Soils Specialist *HS*

RE: Permit Change Application-Gentry Mountain Air Shaft, Cyprus Plateau Mining Corporation, Star Point Mine, ACT/007/006-92D, Folder #2, Carbon County, Utah

SYNOPSIS

Cyprus Plateau Mining Corporation (CPMC) has responded to my July 14, 1992 deficiency memo. The response was received, in the Division's office, on September 14, 1992.

Hansen, Allen and Luce, Inc. (HAL), with technical assistance from Mr. Kent Crofts, are representing CPMC in this matter and have enumerated their concerns regarding the Division's disposition on particular technical matters. The forthcoming is a response to comments made by HAL.

ANALYSIS

The permittee responded to the July 14, 1992 Division review by stating that the standards elucidated by the SMSS Technical Monograph No. 19 Fourth Edition, 1990, and imposed by the Division, are "difficult to understand". It suggested that the First Edition of SMSS Monograph No. 19 (originally printed in 1983) and Agricultural Handbook 436 (1975) be reviewed. Both publications represent and require that the diagnostic surface horizon (mollic epipedon or A-horizon) of an Argic Pachic Cryoboroll be no less than 40 cm thick.

Therefore, the taxonomic discrepancy noted in my July 14, 1992 memo has not been adequately addressed and must be rectified prior to approval of this permitting action.

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Mr. Crofts requested that the Division explain the logic behind employing family and great group designations to satisfy the requirements of R645-301-200. The information within the Manti-LaSal National Forest Soil Survey (Swensen and others 1983) only provides taxon above the series level. Correlated soil series are not available for the lands in question. Because the system for assigning names and due to the fact that most formative elements carry the same meaning in any combination, a name can convey a great deal of information about a soil. The name of a taxon indicates its position in the classification system, if similarities in important properties are reflected by similarities in the names. Therefore, to ensure the inclusion of essential information and to permit comparison of definitions, a nationally recognized standard format for recording and reviewing specific kinds of information is imperative.

Given the discrepancies that exist between the "representative" soil profile descriptions provided in the permit (i.e., Exhibit 222.300a, page 29, Map 222.100a; Table 230.200i, Map 222.100f) and the accepted diagnostic criteria set forth by the National Cooperative Soil Survey, as well as the Division's recommendation that all areas to be disturbed be surveyed at the Order I soil survey level, the permittee must provide site specific soil profile descriptions which accurately represent the soils resource within the lands to be disturbed within the currently approved permit area.

RECOMMENDATION

The aforementioned deficiencies must be adequately addressed prior to approval of this permitting action.

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