

coal file ACT/007/009

0070



SCOTT M. MATHESON  
GOVERNOR



STATE OF UTAH  
DEPARTMENT OF COMMUNITY AND  
ECONOMIC DEVELOPMENT

RECEIVED

Division of  
State History  
(UTAH STATE HISTORICAL SOCIETY)

MELVIN T. SMITH, DIRECTOR  
300 RIO GRANDE  
SALT LAKE CITY, UTAH 84101  
TELEPHONE 801 / 533-5755

January 30, 1981

FEB 5 1981

James W. Smith, Jr.  
Division of Oil, Gas and Mining  
1588 West North Temple  
Salt Lake City, Utah 84116

DIVISION OF  
OIL, GAS & MINING

RE: Eureka Energy Company, Sage Point Dugout Canyon Project,  
ACT/007/009, Carbon County, Utah

Dear Mr. Smith:

In response to your request for review and in accordance with your responsibility as outlined in 36 CFR 800.4, we are happy to consult with you concerning your project.

The staff of the Utah State Historic Preservation Officer has reviewed the mine plan for the Sage Point Dugout Canyon Project, specifically the cultural and historical resource portion. The staff believes that there are three serious deficiencies in the report which would need correction before our office would recommend to the Division of Oil, Gas, and Mining that this report would be acceptable to submit as part of the overall mining plan.

The first area is that historic work has not been completed on the project, and determination of the eligibility of some of the historic sites has not been completed. This should be done as part of the report before submitting it.

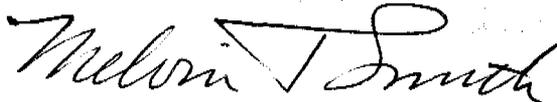
The second, and most serious problem, is that determinations of eligibility for the sites are being made using two systems, the Bureau of Land Management system, CRRS, which is a system to help the archeologist make a determination of eligibility, but is not to be confused with the second system, the criteria for eligibility as outlined by 36 CFR 60.6. First, since the documentation has not been completed on the historic sites, no determination of eligibility can be made on them. Concerning the prehistoric sites, there are nine CRRS:S2 sites listed that have all yielded, or may be likely to yield, information important in the prehistory or history of the region. These meet Criteria D, as outlined in 36 CFR 60.6, and therefore these nine sites should be determined eligible. However, the author goes on to say that none of the nine sites appear to be of such a high caliber of significance to warrant CRRS:S1 status as eligible for nomination as a National Register site.

James W. Smith, Jr.  
RE: Sage Point Dugout Canyon Project  
Page 2  
January 30, 1981

A third area of major concern is that an extensive discussion of the mitigation of adverse impacts is laid out. This would be appropriate if sites are determined eligible as we suggest, however, none of these sites are considered eligible for the National Register, and thus there would be no mitigation of adverse impacts, because only sites that are eligible can be adversely impacted. The report needs to be consistent.

Should you need assistance or clarification, please call or write James L. Dykman, Cultural Resource Advisor, or Wilson G. Martin, Preservation Development Coordinator, Utah State Historical Society, Preservation Development, 300 Rio Grande, Salt Lake City, Utah 84101 (801) 533-7039.

Sincerely,



Melvin T. Smith  
Director and  
State Historic Preservation Officer

JLD: jr: D969SM

RECEIVED

FEB 5 1981

DIVISION OF  
OIL, GAS & MINING