



STATE OF UTAH
NATURAL RESOURCES
Oil, Gas & Mining

Scott M. Matheson, Governor
Temple A. Reynolds, Executive Director
Dianne R. Nielson, Ph.D., Division Director

4241 State Office Building • Salt Lake City, UT 84114 • 801-533-5771

Julie

July 31, 1984

CERTIFIED RETURN RECEIPT REQUESTED
(P402 457 323)

Mr. Bill Green
Sanders Exploration Limited
P. O. Box 1329
Park City, Utah 84060

Dear Mr. Green:

RE: Petition to Modify Notice of Intent for Blazon #3 Drill Hole,
CEP/007/009, Carbon County, Utah

In response to your June 12, 1984 letter, your request for an approval to modify the previously approved coal exploration permit for the Blazon #3 (B3) drill hole is denied. The original "Notice of Intent (NOI) to Commence Coal Exploration" (November 16, 1983) for drill hole (B3), included a request for a variance from the reclamation requirements. This request was to be conditioned upon a formal landowner request to the Division for the same. The Division was to be informed by the applicant if the drill site and road would not be reclaimed. The Division received a Notice from Mr. Jack Otani on August 17, 1983 stating that the road and drill site would not be reclaimed because in his opinion "additional work in the area would prove unrepairable." Upon receipt of this notification by the Division, Notice of Violation (NOV) #83-2-9-1, which had been issued by Ms. Sandy Pruitt for failure to promptly reclaim the disturbed site (pursuant to the original NOI), was terminated.

Due to an oversight, technical staff comments were not solicited prior to the termination of the NOV. Since the exploration project is situated within the mine permit area, an adjustment or change in the postmining land-use to the Blazon Mining and Reclamation Plan (MRP) application would probably be necessary.

Consequently, the Division has formally reviewed this request to abandon the drill site, as part of the overall MRP permit application package. This proposal is deemed to be in conflict with the intent of UMC 815.2(b). Mr. Otani's proposal to leave an unstable access road because damages are unrepairable is unreasonable. Therefore, the request to terminate all reclamation liabilities pertaining to drill hole B3 is denied.

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The Division acknowledges that additional disturbances will be created in reconstructing the access road. However, the present abandoned condition of the road and drill site is a potential source of pollution to Snider Creek and Mud Creek and jeopardizes the major Blazon Mine topsoil stockpile. Further, since the road and drill site are no longer useable, compliance with UCA 40-10-17(2)(b) cannot be achieved.

The following reclamation procedures will be required of Sanders Exploration Limited with regard to the abandoned exploration site.

1. Regrade the drill site and access road to the approximate original contour.
2. Redistribute the available topsoil and revegetate the disturbed site to meet the permanent reclamation performance standards (UMC 817.111-.117).
3. Submit reclamation plans which include at a minimum:
 - a. Current "as-built" drawings or maps detailing the drill site location and access road(s).
 - b. Typical cross-sections of the access road and drill pad (as-built and postreclamation).
 - c. Indicate improvements necessary to reestablish access.
 - d. Drainage and erosion control plans to minimize stream sedimentation to the extent possible.
 - e. Scarification of the redistributed topsoil and use of the permanent revegetation procedures as proposed in the March 23, 1984 Determination of Completeness (DOC) response.

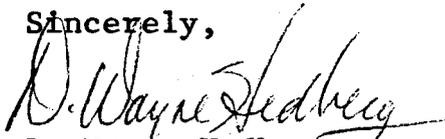
Reclamation plans must be submitted for Division review and approval by September 1, 1984 at the latest.

If Sanders Exploration Limited wishes to continue to pursue its request for abandonment of the access road and drill site, this issue will be brought before the Board of Oil, Gas and Mining for final resolution.

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If you have any questions or comments regarding the above,
please do not hesitate to contact Sandy Pruitt, Sue Linner or myself.

Sincerely,



D. Wayne Hedberg
Permit Supervisor/
Reclamation Hydrologist

DWH/SP:re

cc: Barbara Roberts, Attorney General Office
Ron Daniels
Jim Smith
Joe Helfrich
Sue Linner
Sandy Pruitt

92700-12-14

MRP REVISION/NOV TRACKING FORM

Type of Proposal: COAL NONCOAL

Exploration
NOV Abatement, NOV # _____, Abatement Deadline _____
MRP Revision

Issuing Inspector _____

Title of Proposal: Amended Notice Intent to Commence Coal Exploration

Company name: Sanders Exploration Mine Name: Blagon #3
Limited

File # (PRO/ACT): 007/009 Acreage (Fed/State/Fee): 1/1/1
(CEP/EXP)

<u>Assigned Reviewers:</u>	<u>Review Time (hrs):</u>
(Hydrology) _____	_____
(Wildlife/Veg.) _____	_____
(Engineering) _____	_____
(Soils) _____	_____
(Geology) _____	_____

DATES: Received DWH 6-15-84

- (a) Initial Plan Received 6-14-84 (d) NOV Termination _____
- Tech Review Due _____
- Tech Review Complete _____
- (b) Operator Resubmission _____ (e) Bond Revision _____
- Tech Review Due _____ Amount (\$) _____
- Tech Review Complete _____
- (c) Final Approval _____
- Stipulations Due _____
- Stipulations Received _____

COMMENTS: This amended notice results from issuance of NOV by Sandy Pruitt for unreclaimed exploration + failure to notify DOW. Reclamation recommendations are being generated by tech + inspection staff.

NOTE (INSPECTORS): Please attach a copy of the NOV issued to the abatement plan when received from the operator.

NOTE (REVIEWERS): Please prepare review comments in a format referencing the appropriate regulation or statute. State the deficiency as well as minimum requirement necessary to demonstrate compliance (when possible). Also fill in the number of hours spent in review by discipline. Return the revision/NOV abatement to the Special Permit Supervisor when review is complete.