

state of utah



DIVISION OF WILDLIFE RESOURCES

EQUAL OPPORTUNITY EMPLOYER

DOUGLAS F. DAY  
Director

1596 West North Temple/Salt Lake City, Utah 84116/801-533-9333

July 30, 1981

**RECEIVED**  
AUG 02 1981

Mr. Cleon B. Feight, Director  
Division of Oil, Gas and Mining  
1588 West North Temple  
Salt Lake City, Utah 84116

**DIVISION OF  
OIL, GAS & MINING**

Dear Cleon:

The Division is somewhat concerned over OGM's recent approval on July 15, 1981 to Mr. Charles J. Jahne of Sharon Steel to construct an overland coal conveyor system for the King No. 6 Mine. Just today (July 30, 1981) the Division received detailed specifications concerning such a conveyor. As you know the Resource Analyst in our Price office had earlier indicated a concern for "barrier problems" that could be posed by a conveyor system at the King Mines. The Biologists in our Price office have developed a special expertise concerning the relationship of conveyors to big game ungulate movements.

The Division cannot evaluate any planned conveyor for Sharon Steel prior to August 3, 1981. It is also inappropriate that OGM at this point in time has already directed the Company concerning numbers and placement of crossing structures for big game. OGM personnel do not have the expertism needed for such decisions. Possibly, detailed study may be needed in order to determine placement for crossing points. In any event that responsibility and expertism in this area of concern lies within the Division of Wildlife Resources. When the biological problems have been assessed by the Division, OGM should then be responsible to ensure that impacts are avoided and sufficient crossing structures are provided.

Construction of this conveyor without appropriate planning to provide for migration of mule deer between their summer and winter ranges will result in development of a barrier. As a result of recent findings relative to mule deer and overland coal conveyors in southeastern Utah, it is believed that migration by deer will not be inhibited if a majority of the length of the conveyor is elevated to provide a minimum of one meter clearance beneath the structure. If the Company

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intends to only provide crossing structures at the points needed to allow migration, a detailed study would be required in order to determine those points. Such a study would demand at a minimum monitoring of the proposed route during one winter (November 1 through May 15). If the winter of measurement was mild and migration didn't occur then an additional winter of evaluation would be needed.

Sincerely,

A handwritten signature in black ink, appearing to read "Douglas F. Day", with a large, sweeping flourish extending to the right.

Douglas F. Day  
Director