



State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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THROUGH: Daron Haddock, Permit Supervisor

FROM: Paul Baker, Reclamation Biologist *PBB*

DATE: October 26, 1993

RE: September 24, 1993, Response to Mid-Term Review Deficiencies, Castle Valley Resources, Wellington Preparation Plant, Folder #2, ACT/007/012, Carbon County, Utah

SUMMARY AND ANALYSIS

On September 24, 1993, the Division received a response to a few of the deficiencies raised in the mid-term review. The soils, biology, and land use portions of this response were reviewed and found, for the present, to be adequate. As discussed below, final judgment of the soils response must be reserved until all of the deficiencies have been addressed.

The soils mid-term review deficiency addressed in this response said that the statement in the MRP regarding exemption from R645-301-232.720 should be removed from the plan. The current proposal includes a commitment to comply with this regulation. The regulation states that if substitute soil material cannot be made suitable for meeting the revegetation standards for success, the operator will, as a condition of the permit, import soil material of the quality and quantity necessary to achieve these success standards.

The plan does not contain adequate information to evaluate the proposed borrow sites. Therefore, it is impossible to judge whether or not importation of soil would be necessary. The necessity of having this commitment in the plan is not certain. Until the suitability of borrow soil material is demonstrated, the commitment needs to remain in the plan.

The biology and land use responses deal with vegetation and land use maps. The vegetation map has a larger scale than the previous maps, but it is still easier to read. Some of the locations of the vegetation sampling sites have been obscured, but this information is not critical. The land use map is much more clear than the previous map, and errors noted in the mid-term review have been corrected.



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RECOMMENDATIONS

It is recommended that the soils, biology, and land use portions of this response be accepted with the understanding that the commitment contained in the soils portion regarding importation of soil may need to be modified in the future.